IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

REENA S. MATHEW,	§	
Plaintiff	§	
	§	
V.	§	Civil Action No. 3:23-cv-01494-N
	§	
SANTANDER CONSUMER USA INC.,	§	
Defendant	§	

APPENDIX IN SUPPORT OF PLAINTIFF'S RESPONSE TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

Plaintiff Reena S. Mathew submits this appendix of the documents supporting her response to Defendant's motion for summary judgment, and her brief in support of the response.

Respectfully submitted,

/s/ Donald E. Uloth

Donald E. Uloth

Texas Bar No. 20374200

18208 Preston Road, Suite D-9 # 261

Dallas, Texas 75252 Phone: (214) 989-4396

Fax: (866) 462-6179

Email: don.uloth@uloth.pro

Counsel for Plaintiff

CERTIFICATE OF SERVICE

I certify that on September 20, 2024 I served a copy of this document to Monte Hurst, counsel for Defendant, by email to monte.hurst@hallettperrin.com.

/s/ Donald E. Uloth
Donald E. Uloth

DECLARATION OF REENA S. MATHEW

1. My name is Reena S. Mathew. I am over twenty-one (21) years of age, and I am competent to make this Declaration. I have personal knowledge of the facts set forth herein, and they are all true and correct.

My Work as an HRBP

- 2. I worked for Santander as a salaried employee in Human Resources from February 1, 2011 until April 19, 2016.
- 3. For the last few years of my employment, my title was Human Resources Business Partner ("HRBP"), and I worked at the company's offices in Lewisville, Texas. My immediate supervisor also worked there Angelina Hullum, a Human Resources Manager. Another HR employee working there was Sabrina Boyd, a Human Resources Generalist who handled administrative tasks.
- 4. Santander did annual written performance reviews on all employees. My reviews were always positive, and they all indicated that I was meeting or exceeding expectations. The only annual performance review that I still have in my possession is for 2014. A true and correct copy of this performance review is attached hereto, the pages are numbered App. 46-63. I have a mid-year review for the first half of 2015, but it does not include an overall score. A true and correct copy of this mid-year review is attached hereto, the pages are numbered App. 67-71. The comments are generally favorable, and Angelina Hullum included some goals and things to work on during the second half of the year.
- 5. Santander had an employee recognition program called You Earned It. Any employee could award Your Earned It points to another employee for exemplary work, or going

above and beyond on something. I regularly received points from the business side managers and officers I supported.

- 6. On or about July 10, 2015, Hullum asked me to take on HR responsibilities for 67 employees who worked at another location that we referred to as 8585, because of its street address on Stemmons Freeway in Dallas. I discussed this with Hullum because there were fewer employees total at 8585 than there were in Lewisville, and an HRBP named Hortensia Perez already worked there full time. To me it made more sense to me for Perez to handle these employees, but Hullum assigned the 67 extra employees to me anyway. *See* App. 79-80, which is a true and correct copy of an email from Hullum sent to me on July 10, 2015 confirming this additional responsibility.
- 7. Regarding the issue Elad described in paragraph 7 of her declaration, she did not discuss this issue with me in August 2015. Elad did not coach me on this or any other issue ever.

 Adriano Became my Supervisor
- 8. On or about September 1, 2015, Yessica Adriano replaced Hullum as the Human Resources Manager at the Lewisville, Texas office, and she became my supervisor. Adriano was also put in charge of 8585. Attached as App. 81-82 is a true and correct copy of an email sent on August 24, 2015 describing Adriano's new duties.
- 9. I had a couple of meetings with Adriano to get acquainted. Thereafter, all one-on-one discussions we had were about work, and issues we were handling. Adriano and I never discussed my 2015 mid-year performance review, we did not discuss my 2015 goals, and we did not discuss how Adriano could help me reach my goals and improve.
- 10. From September 1, 2015 through December 1, 2015, Adriano and I never had a one-on-one meeting about my performance, and Adriano never coached me or said there were areas in which I was performing poorly. If we had, then according to company policy, Adriano

was required to make a keep a written record of it. *See* the 2013 Progressive Discipline Policy. A true and correct copy of this policy is attached as App. 39-45.

- 11. Santander consistently used this Progressive Discipline Policy to train and/or punish in order to produce a change in specific behaviors. App. 41 (section 5.1.1, in the definition of Progressive Discipline). The steps described in this policy were: a coaching, a verbal warning, a written warning, and a final warning. The policy required a verbal warning to be maintained in the associate's personnel file, and it required the associate's manager to make a keep a written record of any coaching or other type of warning. App. 42-43. In HR, we consistently preached to the business managers the need to follow this policy, and we worked with the managers to determine the appropriate level of discipline, to document the discipline, and to make sure the manager communicated with the associate about any performance issue in question so the associate could improve.
- 12. The HR employees collectively referred to these coachings and warnings as disciplinary actions (DAs). Every DA was reduced to writing and reviewed, and then entered into a software program that was used to track them. Before December 1, 2015, no one at Santander ever provided me with a coaching or a warning, and this includes purely oral conversations that were not documented there were none.
- 13. In 2015 and 2016, I had a much heavier workload than most other HRBPs. The factor that most affected my workload was employee headcount, the number of employees for whom I had primary HR responsibilities. An HR employee named Nicole Heinicke kept and regularly updated a Headcount by Department spreadsheet that showed the total headcount I and 7 other HR employees at three Dallas area locations were responsible for. Almost every week, Heinicke emailed out a link to this spreadsheet to other HR employees. The weekly spreadsheets

that have been produced in this case show that from September 16, 2015 through April 11, 2016, I consistently had the highest or second-highest headcount of any other HRBP – it was always Whitney Andres or me who was highest. My headcount varied from a low of 646 to a high of 904, and Whitney's headcount shows a low 666 and a high of 706. Below Whitney and me were HRBPs with under 415 employees. *See* App. 310-385. I sometimes mentioned my heavy workload to Adriano and/or Elad hoping for a reprieve. However, no changes were made to balance out my heavy workload with the much lighter workload of other HRBPs.

Things Changed After I Told Adriano I Was Pregnant

- 14. On October 30, 2015, I told Adriano I was pregnant. I remember because I had an appointment that day with my obstetrician/gynecologist for a checkup. I was 39 years old at the time, and because of my age, this was considered a high-risk pregnancy. This was my first appointment with the OB-GYN during this pregnancy, and I was anxious to find out if everything was okay. The doctor confirmed that everything was going well, so I planned to tell Adriano that I was pregnant when I got back to the office.
- 15. When I got back to work after the appointment, I went into Adriano's office and told her I was pregnant. During this brief discussion, Adriano asked me what my plans were for after the baby was born. I told her I did not yet know for certain.
- 16. Adriano's immediate supervisor was Stephanie Elad, a Director of Human Resources. She also worked at Lewisville, and our offices were all close together. My relationship with Adriano and Elad changed right after I told Adriano that I was pregnant. Before, we would usually say hello in the morning and exchange greetings, but that stopped. Their attitudes changed from being friendly to being cold and distant.

December 1, 2015 – The First of Two PIPs

- 17. On December 1, 2015, I had a meeting with Adriano to go over my 2015 annual performance review. I was expecting a positive review, but in this meeting, Adriano told me she planned to give me a negative performance review that would say I was not meeting expectations. She told me she was putting me on a 30-day performance improvement plan ("PIP"), and she handed me a written PIP. A true and correct copy of this PIP is attached to this declaration, App. 100-102.
- 18. There were three places in the PIP where it said: "See Addendum for Specifics," but there was no Addendum attached. I reminded Adriano that it was standard operating procedure to document performance issues before putting an employee on a PIP, I asked Adriano to show me any documentation supporting her decision to put me on a PIP. She seemed surprised by my comments, and she had no supporting documentation.
- 19. I lost my composure and cried through most of this meeting. I was beyond upset by this, and I remember feeling my stomach clench and the muscles remained tight throughout this meeting and for a while thereafter. I felt completely blindsided and could not believe this new Manager was placing me on a PIP without any type of prior notification of any negative performance issues. A negative performance review and a PIP would disqualify me from receiving my annual bonus, and it would prevent me from getting my next scheduled pay raise. I had been doing a good job, and Adriano cited no facts showing otherwise. My job was now in jeopardy, and this made me fear the loss of an income and loss of benefits to cover the medical bills I would incur for the birth of my child. This anxiety was overwhelming, and it was with me daily throughout the month of December, like trying to walk on eggshells without breaking them.

- 20. After the meeting, I started contacting people in the chain of command above Adriano to let them know what was going on, and to express my views that a negative performance review and a PIP were unwarranted. I started with an email that day to Adriano's immediate supervisor, Stephanie Elad. A true and correct copy of this email is attached to this declaration, App. 104.
- 21. In my email to Elad, I told her I had never had any formal coaching or discussion about my performance, and I had always received positive employment reviews. I asked her about the attendance issues Adriano raised and how my attendance differed from anyone else's. Elad never answered that question. I also said: "I was completely shocked and upset and working in HR I know that an associate shouldn't be surprised let alone have first time discussions about issues during a review." App. 104.
- 22. On December 3, 2015, I sent an email to the top HR professional in the company, Michelle Watley. App. 105. After that, I sent an email to Pamela Blackburn (Executive Vice President Human Resources). App. 110-111.
- 23. On December 7, 2015, I sent an email to Christopher Mays asking "have we ever put anyone on a PIP without clear cut/written documentation, for example, say the Manager said they coached the associate but there are no notes/dates etc.?" Mays was a manager in charge of talent development, which involved developing and improving the skills and talent of Santander's employees. I thought if anyone knew the answer to this question, it would be him. Mays responded: "I have never worked on a PIP without the proper documentation but not sure if there is a case where this has happened with someone else. It's just like any other disciplinary action you need documentation to validate the PIP." A true and correct copy of these emails is attached, App. 106.

- 24. I dispute Santander's contention stating a reason why a PIP was more appropriate than a written warning. Santander claims a written warning "would not capture the bigger picture of how she needed to improve her performance in a number of categories." Of course it would, if that is what they chose to write in the written warning. Going from no documented coaching or warning to a PIP was unprecedented for any employee at Santander based on my experience. I had never seen or heard of that being done during almost five years working there.
- 25. On December 9, 2015, I had a long phone call with Stephen Shaffer. I told him that in theory, every employee can improve, but a manager needs to tell the employee that there is a problem and try to resolve it before putting an employee on a PIP. I let him know that I felt betrayed and blindsided because I had been working under Adriano and Elad for months, and neither one of them said anything to me about having performance problems. To go from no coaching or documentation to being on a PIP was unprecedented at Santander.
- 26. I never told Shaffer that 30 days was not enough time for a PIP, or that I wanted a longer PIP not in this conversation, or any other that we had. No one wants a longer PIP, and certainly I did not I wanted the PIP rescinded and gone.
- 27. After the call, I sent Shaffer an email thanking him for taking the time to talk to me. In my email I said: "If these are areas of opportunity that I need to work on, I can accept that but I don't accept them being brought to my attention as areas of concern for the first time during my review, let alone being placed on a PIP." App. 112.
- 28. Normally during a PIP, a manager has regular and ongoing conversations with the employee to make sure the expectations are clearly communicated, and any deviation from expectations is pointed out promptly so the employee knows what to do and what not to do. In December 2015, I did not have a single conversation with Adriano about my performance or an

alleged failure to meet expectations. We had discussions about pending work issues, but she never said my performance was anything less than expected, and she never told me there were issues or concerns about my performance.

- 29. Being placed on a PIP was unwarranted, demeaning, and it felt like a betrayal. Adriano gave me nothing but positive feedback before my pregnancy announcement. I felt like I did not even know who Adriano was. I was sick to her stomach every day, not knowing what else she would come across. I physically felt sick most of the time, and I sometimes would shake with the thought of the unknown.
- 30. As December was ending, I started to look forward to the end of the PIP. I had not heard anything negative about my performance, so I believed this would soon all be behind me. I was also told that my review would show I was meeting expectations, and told that I would receive my annual bonus. Things seemed to be getting back on track.

January 2016 – The Second PIP

- 31. In early January 2016, I had another conversation with Shaffer. He told me I was being placed on another PIP, this one for 90 days. I knew this was unwarranted and contrary to company policy.
- 32. On January 15, 2016, I met with Adriano and Elad. They handed me two documents: (1) a Performance Improvement Plan (this one had the Addendum attached, which was a timeline of events), and (2) a 90 Day Action Plan. True and correct copies of these documents are attached as App. 145-151, and App. 152-153, respectively. Adriano and Elad said the three of us would meet every two weeks, and within 48 hours of each meeting, I was supposed to send an email to Adriano recapping our discussion. They did not say the recap needed to be detailed and should include every item of subject matter we discussed.

- 33. Once again, I believed a PIP was improper. I did not agree that my past performance showed a need for improvement, and I knew putting me on a PIP over issues that were ever raised with and discussed with me was not consistent with Santander's regular business practices.
- 34. When I went through the timeline that was attached to the PIP, I saw that it was not an accurate description of the events, and it incorrectly stated that both Hullum and Adriano had coached me on things such as attendance issues. I typed my comments into the timeline, and I sent it to Stephen Shaffer on January 18, 2016. True and correct copies of my email and the attached timeline are attached to my declaration as App. 156 and App. 159-163, respectively. My comments included some of the following points.

Santander's Examples of Poor Performance

- 35. <u>January 2015</u>. Santander began using a new procedure for processing data when a contractor's assignment ended, and there were problems. In this instance, I did not see that I was supposed to do the data entry to note that a contractor's assignment had ended, which caused a delay making the necessary changes in the computer records. It was an ongoing problem for other HRBPs as well. Elad decided the oversight did not warrant any disciplinary action. On January 22, 2015, in an email to Hullum, Elad said: "I would just have a conversation with Reena. This is a new process so I know we are going to have a few bumps." App. 72. Elad never coached me about this incident.
- 36. <u>February 11, 2015</u>. The first item on the timeline is false. She said I failed to send Hullum a summary of an HR luncheon I went to, but that's not true. The luncheon took place on February 10, 2015, and I emailed my summary to Hullum on February 12, 2015. A true

and correct copy of this February 10 email is attached to my declaration, App. 74-75. I later forwarded this email to Shaffer so he had proof that I had sent the summary. App. 74.

- 37. Monthly recaps (April 9, 2015, May 18, 2015, and August 13, 2015). For a few months in 2015, Hullum asked her HR employees to send her an email providing certain information on things we had done during the preceding month. Among other things, she asked about meetings with business leaders, training, and activities that we referred to as "side by sides," "jumpstarts."
- 38. There was no policy or rule requiring HRBPs to do a certain number of these things, and Hullum never set an expectation about what she wanted us to do. So we did them when and as needed. It was common for one HRBP to do more monthly side by sides, jumpstarts etc. than others did. If Hullum thought I needed to do more of anything, she could have said something to me, and I would have done it. Hullum never gave me any feedback on any of the monthly recaps I sent her. She never questioned why I had not done more of any one thing, and she never told me to do more.
- 39. Attendance issues: Several entries in the timeline point to times I asked for and got approval to arrive late, take a longer lunch, or leave early. I never did so without prior approval, and if my request was denied, I worked my normal schedule. No one ever told me I needed to give more advance notice of such requests. No one ever said these deviations from the routine adversely affected my coworkers, or the business-side employees that we served. The facts about these attendance issues are as follows:
 - a. <u>July 1, 2015</u>. I emailed a coworker to let her know I was leaving for a doctor's appointment at 1 pm and I asked if she was ok with that. App. 78. I did not need her permission, but I wanted to make sure she was okay with me leaving in case

- maybe there was something important going on that I did not know about, in which case I would have stayed. She told me it was ok if I left at 1 pm and worked remotely after the appointment.
- b. August 23, 2015. I asked Hullum if it would be ok if I was a little late the next day, and she told me it would be no problem.
- c. <u>September 3, 2015</u>. I emailed Adriano asking to use some of my accrued paid time off (PTO), including a half-day off the next day, and some full days later in the month. Hullum replied: "Hi Reena, that is fine, may you please input the dates into my calendar." A true and correct copy of this email exchange is attached, App. 83.
- d. <u>September 4, 2015</u>. Adriano had approved this as a half day, but the timeline says I worked longer, until 2 pm. App. 149-150. I completed all of my work before leaving, and there was nothing left undone that someone else had to cover.
- e. <u>September 17, 2015</u>. I never left early without my manager's knowledge and approval, and this day was no exception.
- f. October 29, 2015. I told Adriano that I had a doctor's appointment the next morning. It was an important appointment (first OB-GYN appointment of my pregnancy), but I did not tell Adriano I couldn't miss it. To the contrary, after Adriano and I talked about things going on at work that day, I offered to reschedule the appointment, and I called the doctor's office to reschedule. The only available times were several days out, and I spoke to Adriano again. She told me to keep the appointment and I could arrive late the next morning. App.

- 161 (my January 18, 2016 comments on the timeline). I would have rescheduled the appointment if Adriano didn't approve the late arrival in advance.
- g. November 16, 2015. In an instant message conversation, I asked Adriano if I could leave around 3 pm, and I asked if she would be able to help Sabrina Boyd with a short ten-minute task at 5 pm. This was a new-hire class, and we needed to collect and make copies of driver's licenses and social security cards. Adriano told me "yes no issue." A true and correct copy of these messages is attached, App. 89.
- h. November 25, 2015. The timeline is wrong about the date here. On November 24, 2015, I let Adriano know that I had a doctor's appointment during my lunch and I might be gone for a little more than an hour. Adriano did not object. If she had, I would have rescheduled the appointment. A true and correct copy of this instant message conversation is attached, App. 95.
- 40. <u>July 2, 2015</u>. Angelina Hullum asked me if I could work on a task that was not even my job. I was busy, so instead of promising to do things I might not have time to do that day, I asked her if this could be assigned to someone else to handle.
- 41. <u>July 10, 2015</u>. This is when I was assigned 67 employees at 8585. Hullum asked me to do it, and I complied with her request.
- 42. <u>August 23, 2015</u>. I got prior approval from Hullum to arrive slightly later the next day, and I would not have come in late without her prior approval.
- 43. <u>July-August 2015</u>. I have the following clarifications about the four paragraphs in this portion of the timeline:

- a. "Stated the work load ..." With the additional responsibilities for the employees at 8585, I was very busy. Hullum said she thought it might help if I kept track of my daily activities in 15-minute increments, which I did. She was no more specific than that. She did not show me an example of what she meant, nor did she describe the level of detail she was seeking. It was difficult to track things in 15-minute increments because I rarely worked on a single thing for 15 minutes without having to deal with something else, like answering a call or responding to an email. Hullum did not ask me to do the time study a second time, and she never told me the time study I submitted was vague.
- b. "Continually reminded ..." Hullum never told me I needed to work full shifts, and she never told me to provide more notice when requesting to leave early. I needed no such warnings or reminders, because I got my work done, and I did it well. The only time someone else ever had to do something for me because of an absence was the ten-minute task on November 16, 2015 (discussed above).
- c. "Strongly advised ..." This sentence is not true, Hullum and I never had such a conversation.
- d. "Manager constantly stepped in ..." This sentence is also not true. Hullum never had to take over a DA I was working on to finalize it. Hullum never had to take over a termination that I was handling and process it.
- 44. <u>September 28, 2015</u>. The HRM referenced here is Yessica Adriano, and we never had a conversation like the one she describes here. She never told me that my job required a high level of efficiency. It did, but she didn't ever tell me that.

- 45. October 12, 2015. The investigation checklist was a project that I and several other HRBPs started working on about ten months earlier. By October 12, 2015, the project was finished. Adriano went over the final documents with other Human Resources Managers and the HR Director, Stephanie Elad. Adriano told me Elad wanted one thing changed, and she would do that herself. It's not true that I asked Adriano for assistance with the investigation checklist.
- 46. October 29, 2015. "Brad, site Director ..." This was a Thursday. On Monday and Tuesday of this week, I was out of the office attending a conference sponsored by SHRM (Society for Human Resource Management). On Wednesday, I saw that three separate business units had asked HR to prepare some DA's, and so far no one had done anything about them. I sent an email to the AVP over each department letting them know I'd been out for two days, but the requests have been received and they would be ready no later than Friday. A true and correct copy of my email to the AVPs is attached, App. 87. On October 29, 2015, Brad Denetz came into the HR offices to discuss something unrelated to the DAs, and he talked with Adriano and me. During the conversation, he asked about the status of the DAs, but he did not say he needed them ASAP. Later that day, in an instant message conversation with Adriano, I updated Adriano on the status of the DAs. App. 88. She did not say that any of the DAs needed to be done ASAP. She did not advise me that DA's are time sensitive. I do recall her telling me to let her know if I was ever behind so others could assist.
- 47. November 6, 2015. Sabrina Boyd was reviewing an employee's request for time off due to a death in the family. Sabrina came to my office, and she told me she was suspicious about the request. I did a quick Google search, and we confirmed there was good reason to be suspicious. It was less than ten minutes. Elad then came into my office and told us to quit

spending time on this, so we did. The statement about not following Elad's instruction and wasting additional time is false. When she said stop, we stopped.

- 48. <u>November 9, 2015</u>. No such feedback was provided. The first time I heard that there was a concern about this issue was on January 15, 2016, when Adriano put me on a PIP and I saw this entry in the timeline. It had not been discussed before that.
- 49. November 17, 2015. The first paragraph for this date in the timeline is false.

 Adriano never reminded me about prior notification about leaving early. As the documents show, I always gave such notification and either got approval or did not take off. Adriano never told me "the team" had to do anything to cover for me. There is some truth to the second paragraph, I did at times say the workload was overwhelming, but Adriano never did anything to balance out the workload amongst the HRBPs.
- 50. November 20, 2015. Late in the day I got a call from Jeff, a manager at 8585 in Dallas. He had an issue with an employee at that location. He needed someone from HR to talk to the employee, and to follow up if necessary. Hortensia Perez was the on-site HRBP at that location, so it made sense for her to speak to the employee since she was already there. I spoke to Adriano and cleared that plan with her. Otherwise, I would have handled it.

51. November 23, 2015.

a. The standing rule for processing employee resignations was to have them done by the end of the business day following the resignation. I learned of this employee's resignation Monday morning when I checked my email, and I planned to process the termination that day. Before I did so, Adriano told me she would do it.

- b. Regarding the last sentence in this first paragraph, "the situation was mishandled and was not followed up on," I was not at fault in how the earlier situation was handled. Here is the background on this.
 - i. On October 19, 2015, an AVP named Tara Stewart asked me to sit in on a meeting the next day with an employee named Deirdre Crouch. Stewart was already working on this issue with Misty Donnell, an HRBP at the North Richland Hills location, so my involvement was limited to this one meeting.
 - ii. Stewart led the meeting and asked questions. She was able to identify a few discreet issues, and she assured Crouch that she would follow up and try to resolve the conflicts she had with her manager. The meeting lasted over an hour, and it ended with Crouch stating that she felt better. That was the end of my involvement, Stewart did not ask me to do anything else. I also knew that Misty Donnell was working with her, so there was nothing further for me to do. I later wrote a summary of this meeting.

 App. 86.
 - iii. After Crouch resigned a month later, Adriano later did an investigation and wrote a summary. App. 120-122. It says I should not have met with Stewart and Crouch together because Crouch had previously mentioned her discomfort with Stewart. I had no say over who was going to be at this meeting, I was just doing what an AVP asked. This criticism is baseless.

- iv. I did not assume the responsibility of conducting the investigation. I did only what Stewart asked me to do, and I knew she was working with another HRBP on the matter.
- v. I dispute the contention that I concluded none of Crouch's complaints were substantiated. The investigation summary I wrote does not include this conclusion, and I never said this to Adriano.
- vi. I never told Adriano that I did not read Crouch's entire email, and I did not tell her that I did not believe Crouch. Adriano also says there was no follow up. Because the matter was being handled by others, there was nothing further required of me. If this had been my investigation and I failed to follow up, this could be a valid criticism, but given my limited role with this employee's issues it is not.
- vii. There is evidence indicating that whoever was in charge of this investigation could have done better. For example, in an email dated November 24, 2015 describing the events, Hullum said: "There were too many hands in this situation, with the confusion as to who was handling what/based on location/departments. Jodi, Misty and I were on one page, and Reena and Tara were on another page. In the end, I believe Tara ended up making her own decision and placing the Associate on the DA, which I thought was a Final." A true and correct copy of this email is attached, App. 94.
- viii. Adriano did not reprimand me, or tell me I must investigate with an open and fair mind.

- 52. November 23, 2015 (second paragraph). This was a termination due to falsification of time, and my termination request clearly stated the basis for termination. It was not vague. Adriano did later ask me for my notes from a meeting, and I sent them, but she never asked me to revise and resend the termination request. Regarding the fact that I and two others met with the associate, Adriano said nothing about that to me at the time.
- 53. November 24, 2015. I saw that another part of the HR department was asking us for help with some compliance issues paperwork we needed to do to comply with regulations that applied to Santander because we did consumer lending. This was not a part of my job. I was willing to pitch in and help, but I did not want to do all of them myself because it would take me away from doing things that I was responsible for. In an instant message, Adriano asked me what else I had going on. I did not respond in detail right then because I had to leave for a doctor's appointment, so I suggested we discuss it when she had time. A true and correct copy of these messages is attached, App. 95.
- 54. <u>December 8, 2015</u>. Adriano did not mention this to me in December, I saw the comments about this in the timeline for the first time in January 2015. I had helped a manager in the credit cards group, Jeff, with some employees who were bickering with each other. I suggested transferring one of the employees, which is something we often did in such situations. He agreed with my suggestion, and it solved the problem. I handled the matter start to finish. If the manager or his AVP had asked to have a different HR member review and finalize the case, normally this would have been done, but in this instance that did not happen. I don't know what the timeliness issue mentioned here was, Adriano never told me.
- 55. <u>December 22, 2015</u>. I wish I knew which "Senior leadership members" Adriano is talking about here so I might know what Adriano thinks I did. But without the specifics, it's

impossible to defend against her accusations here. All I can say is that I never spoke to one of the business leaders or managers about anything they said about me to my supervisors.

- 56. <u>December 28, 2015</u>. On this issue, Adriano claims that I should have done something that was not possible. Here are the facts:
 - a. Pay day at Santander was every other Friday. All time had to be entered into Kronos (a software program) and audited by close of business on Monday before pay day. December 28, 2015 was a Monday preceding payday. That afternoon, another HRBP, Whitney Andres, realized we had a problem. For several employees who had worked on Christmas, their time was not coded correctly in Kronos, and there were several steps that needed to be performed to correct it, or these employees wouldn't be paid for working on a holiday. Andres sent an email, and I got busy working on the issue along with some of the other HR professionals at the other affected locations. Adriano did not ask me to work on this issue. She was off that day.
 - b. One of the steps that needed to be completed involved the time audit in Kronos.

 This is something only the HR Generalists did, and none of the HRBPs were trained on this. All of the HR Generalists at the locations affected were off that day, which should not have ever happened on a Monday preceding pay day.
 - c. Adriano claims that I should have worked with peers and found a solution, but that was not possible. I did not have the proper training to do the Kronos audit, and no one else working that day had such training either. Adriano (who was also off that day) spoke to Sabrina Boyd. To her credit, Boyd stepped in and did all

- the work in Kronos necessary for the payroll to be corrected in time. A true and correct copy of emails we all exchanged that day is attached, App. 133-135.
- d. Adriano never told me I should have handled this differently. If she had, and we had discussed it, she might understand why she is wrong about this issue. At the time, Adriano said nothing to me about the way I handled things except for an email saying "Thank you Reena!!" A true and correct copy of this email is attached, App. 136.

The Second PIP Begins

- 53. After expressing my disagreement with the second PIP, I resolved to move forward. The PIP and the 90 Day Action Plan offered me the option of taking training classes, but it was not mandatory, and no courses were specified or recommended. I was always interested in ongoing training and improvement and did training when possible, so I was open to suggestions, but no suggestions were provided.
- 57. In the 90 Day Action Plan, it said I could shadow another HRBP if I wanted to, but no one ever asked me or told me to do this. App. 153. I question this suggestion because I was the one who helped teach and train the other HRBPs. In my 2014 Annual Performance Review, my HR Manager (Hullum) noted in her comments that I was good at helping/training other HRBPs. App. 51-52, 60.
- 58. The first PIP said I had difficulty meeting deadlines, which I disagreed with. No examples were provided, but from December 1, 2015 going forward I was attentive to this.

 The First Biweekly Meeting, and Subsequent Events
- 59. On January 29, 2016, I met with Adriano and Elad. This was the first biweekly meeting required as part of the PIP. They had no criticisms to share, and the meeting was

uneventful. As previously instructed, I wrote a recap of the meeting and sent it to Adriano within 48 hours. App. 175.

- 60. In early February 2016, I investigated a confrontation between employees named John and Monisha. On February 10, 2016, I sent an investigation summary about John to Adriano by email. A true and correct copy of this email is attached, App. 180-181.
- 61. On February 12, 2016, I talked to Adriano and Elad about the two investigations. Elad asked me to move some text ("email from John Leavell's wife") from "Confirmed Allegations" to the "Unconfirmed Allegations" section of the summary. I made the change Elad requested, and I sent the revised summary to her on February 16. App. 187.
- 62. I had the Monisha investigation ready to send on Monday morning, February 15, 2016. We were following new procedures for termination requests and investigation summaries, and before I sent everything to Elad I needed clarification from Adriano about the process. I sent her an instant message at 9:57 a.m. asking her a question, thinking it was better to get it right the first time instead of having to fix it later. App. 182. After Adriano answered my question, I sent the Monisha investigation summary to Elad at 12:43 p.m. App. 184-185. I would have sent it Monday morning, but the delay getting an answer from Adriano pushed it into early afternoon.

 The Second Biweekly Meeting
- 63. On February 17, 2016, we had our second biweekly meeting. Elad and Adriano asked me a few questions about a time study I turned in, but they did not give me any instructions to do the time study differently or to include more detail. Rather, Adriano told me I could stop doing the time study, and she later confirmed this in writing. App. 225.
- 64. In place of the time study, they assigned yet another task: to do a weekly email providing information about the disciplinary actions and investigations I had worked on during

the week, and send it to Adriano by 5 p.m. App. 225. Unlike some other instances, this deadline was specific, and I always met it.

- 65. We also discussed the Monisha and John investigation summaries, and they claimed I submitted the Monisha summary late. I explained the delay waiting for an answer from Adriano, but they insisted it was still a missed deadline, and we left it at that. There was no extensive coaching regarding the timeliness of my work.
- 66. Elad and Adriano did not provide extensive coaching about following instructions when conducting an investigation. Adriano brought this up as an issue later, after the meeting. In my meeting recap, I mentioned Elad's February 12 request asking me to <u>move</u> a piece of text. App. 210. In her response, Adriano claims the instruction was to <u>remove</u> the text, and I failed to follow that instruction. App. 210. Adriano was wrong about the instruction. I did exactly as instructed, and when I sent the revised meeting summary to Elad, she replied with an email stating "Approved." App. 184.
- 67. In the February 17, 2016 meeting, Adriano did not ask me to provide an increased level of detail in my next meeting recap. I dispute her assertion that she asked me for "a written summary detailing [our] meeting." It's true that in an earlier meeting, Adriano asked me to send her a recap of our meetings no later than 48 hours afterwards. On February 17, however, there was no additional discussion about providing a new level of detail in the meeting recaps.

 Therefore, after the meeting, I wrote and sent a recap that was similar to the first recap, which was a general overview of what we discussed. App. 201.
- 68. Adriano responded on February 19, 2016 by claiming I failed to meet expectations that she never set about the level of detail for the recap, and she told me to redo the recap and add significantly more detail. App. 203. I forwarded the emails to Elad hoping she

could help us avoid future miscommunications about expectations, App. 206, and I redid the recap to include all the specifics of everything we discussed. App. 209-211.

- 69. It was only afterwards that Adriano clarified her expectations about the level of detail to include in these recaps. She explained her expectations in an email dated February 22, 2016. App. 209. If she had given me these instructions before I sent the second recap, I would have complied and sent a detailed summary. Going forward, I did what she asked, and it was never an issue again.
- 70. In this same email, Adriano said she would send me a response to each one of my recaps within 48 hours after she received my recap. App. 209. Adriano did not keep this promise even once. We had two more biweekly meetings after this. Our third biweekly meeting was on March 8, 2016. I sent my meeting recap to Adriano that same day, and Adriano did not send her response until March 22, 2016 (14 days later). App. 244-245. We had a fourth biweekly meeting on March 23, 2016. I sent my meeting recap on March 24, 2016, App. 246. Adriano did not provide a response until she handed it to me during our last meeting on April 15, 2016 (22 days later). App. 263-265. By this time, Santander had already made the decision to fire me, so the comments were too late to be of any assistance with the stated goal of improving my performance.

The 30-Day Review

71. On February 26, 2016, I met with Elad and Adriano, and they gave me a written 30-Day Review. App. 217-225. There were no new criticisms. In the section titled Consulting, it stated: "During these past 30 days, you have lead four investigations each of which we have discussed and agreed upon course of actions to take-this has worked out well, and we will continue this strategy." App. 217.

The Third Biweekly Meeting

- 72. On March 8, 2016, I met with Elad and Adriano for the third biweekly PIP meeting. They acknowledged my attendance was good and not an issue. They acknowledged that time management was good, and in her subsequent recap Adriano thanked me for helping with administrative tasks. Neither supervisor said I needed to improve with respect to time management or with effective work habits. App. 244-246.
- 73. With respect to consulting, Adriano announced a change of direction for HRBPs doing investigations. Instead of partnering with her during an investigation, she asked me to act more independently and make my own decisions on some things. I said I was willing to do so if that was the direction we were moving in, but I was hesitant to start this while I was on a PIP because it might backfire on me. Adriano responded to this as follows: "We stated we understood your hesitation, however the expectation of our HRBPs as consultants is to work independently in anticipating and making judgment calls as necessary, and work with management in escalated situations." App. 244.
- 74. Neither supervisor said anything in the March 8 meeting about me constantly interrupting Adriano during investigations. Neither supervisor said anything to me about training opportunities in this meeting.

The March 11, 2016 "Misrepresentation"

- 75. Elad later accused me of misrepresenting something to her in an email I sent on March 11, 2016. Understanding this requires a little background.
- 76. For almost one year, I had been working on a project intended to reward employees for perfect attendance. Every month or two, I sought assistance from HRIS (Human Resources Information Systems) to get information concerning attendance.

- 77. This proved to be difficult, because the computer systems Santander used could not automatically provide the information we wanted. Over time, we tweaked and narrowed the criteria we would use to determine perfect attendance, and HRIS made some technical progress to help get that information from our timekeeping software. I was the main point of contact between (a) the HR and business managers designing the project, and (b) and the HRIS employees getting us the data.
- 78. On March 10, 2016, an officer working on the design of the project asked Stephanie Elad and me to tell him how many employees had perfect attendance during the last three months of 2015. I said I would find out. App. 227.
- 79. On March 11, 2016, I sent an email to Elad saying that I was partnering with HRIS to assist getting the information. App. 229-230. A few minutes later, I emailed HRIS asking them for the specific data. App. 231-232.
- 80. I later learned that Elad construed my statement "I am also partnering with HRIS" as a false representation that I had already asked HRIS for the data, before sending her this email. She told me this was misleading. I apologized for the miscommunication, and explained I was and had been partnering with HRIS for months, and would do so again to get this information as well, and that's all I meant when I emailed her that I was partnering. I was not trying to make it sound like I had already asked for the information.

Fourth Biweekly Meeting

81. On March 23, 2016, I had my fourth biweekly meeting with Elad and Adriano.

As with the last meeting, they had no criticisms about two of the three categories, attendance and time management. App. 263.

- 82. With respect to the third area, consulting, they reiterated points made in the last meeting about starting to exercise more independent judgment during investigations. App. 263. They did not say I was falling short in this area. Adriano did not claim I had been interrupting her too much with questions, and she did not say I was impairing her productivity.
- 83. It was in this meeting that I learned of Elad's belief that I tried to mislead her on March 11 when I said I was partnering with HRIS. Elad never allowed the possibility that we miscommunicated, and she brought this up yet again at the next meeting we had.

The Talking Points for the Perfect Attendance Program

- 84. On March 28, 2016, Elad sent me an email about the perfect attendance program I was working on, stating: "I'd like to provide the business with talking points to introduce and cascade this program. Please put something together for my review by EOD Friday. Yessica should review and provide input prior to sending to me. This communication will go to the Associate level." App. 248.
- 85. That Friday, April 1, 2016, I had set aside time to prepare the talking points Elad wanted. However, Adriano insisted that I prioritize an issue for one of the managers, Jorge Munoz, instead of working on the talking points. I did the work on the investigation, and then I closed my door to work on the talking points. I was also reviewing some attendance data that Elad wanted, so there was a lot to finish by the end of the day.
- 86. Adriano left early that day without telling me or checking on the status of this project, even though she knew she was supposed to review it that day before I sent it to Elad. I was able to reach her by phone and have her review the talking points I had written, and then I sent it to Elad at 7:17. App. 252. I stayed late and put in the extra work required to get this to Elad on the day it was due.

87. Elad nevertheless sent an email to Stephen Shaffer accusing me of missing the deadline. Her email she said the deadline was "EOB" (end of business) instead of "EOD" (end of day), which was not true. App. 251. Elad misrepresented the facts to Shaffer to make it sound like I missed a deadline. Shaffer replied telling her she should have been more specific and said it was due at 5:00 pm. App. 251.

The Brittany Brodie Investigation

- 88. The week of April 4, 2016, Adriano and I both investigated a situation involving an employee named Brittany Brodie. My portion of the investigation summary was finished on Wednesday, April 6, 2016, and I sent an instant message to Adriano asking if she had her part finished so I could submit the final report. She said she had not finished, so we agreed that I could submit the final report the next day. App. 256. Adriano did not provide her part of the investigation until Friday, April 8, 2016.
- 89. On Thursday, April 7, 2016, an Assistant Vice President asked us to interview another witness as part of this investigation, which I did that afternoon. On Friday, April 8, 2016, I still had not received Adriano's portion of the report, so I sent her a draft of the report with a reminder in red text to add her portion in the body of the report. App. 391-392 (see the comment: "Yessica, could you pls fill this part in?).

Our Last Meeting – 4/15/16

- 90. Adriano never responded to my recap of our March 23, 2016 meeting, and I thought that no news was good news. However, in our next meeting, which proved to be our last, I learned I was wrong, and things had been simmering unmentioned for weeks.
- 91. On April 15, 2015, I met with Elad and Adriano for a 90 Day Review. Adriano handed me a document that said, at the top: "March 23, 2016 Meeting Recap." A true and

correct copy of this document is attached, App. 263-265. I was also given a document that said 90 Day Review at the top. A true and correct copy of this document is attached, App. 266-268.

- 92. In the first document, the meeting recap, there was nothing negative noted regarding attendance or time management. App. 263.
- 93. Under the category of consulting, Adriano went on at length about the alleged misrepresentation on March 11, 2016, and she added more criticisms about that incident that had not been mentioned at all during the one-month plus since then. She said I waited too long to contact HRIS to ask for the information the officer wanted, I should have asked "much sooner." App. 264. The officer asked for the information on a Thursday, and I asked HRIS for the information the next day. I could not have done it "much" sooner, and even Elad did not see a problem with the fact that I did it the next day. App. 249. Adriano falsely accused me of blaming HRIS and the officer for delays getting the information from HRIS. App. 264. I never blamed them for delay. Adriano, Elad and I all expressed frustration about the process for getting the information, App. 233, but I never blamed HRIS or the officer for anything. Adriano also claimed Boyd had to step in, and she identified and overcame issues that I could not. App. 264. This too was false. At my request (made via email while I was out on vacation) Boyd sent an email to HRIS asking if they were working on my March 11 request for information, App. 239, and she sorted some of the information from HRIS according to my instructions. But I was otherwise responsible for all aspects of the communications to get the data we needed from HRIS.
- 94. Another issue mentioned for the first time in this document was the accusation of missing Elad's EOD deadline to send the talking points, a deadline I had not missed. Adriano accused me of poor time management because I worked on an investigation that day before the

talking points were finished. App. 264. I did so only because she told me to make the investigation the top priority that day, so if it was poor judgment to prioritize the investigation, it was Adriano's poor judgment, not mine.

- 95. Yet another issue raised for the first time in this document concerned the Brittany Brodie investigation. Adriano claimed I should have submitted my investigation summary sooner, App. 265, but I could not have done it any sooner. As discussed above, I had everything done on a Wednesday, but I had to wait for Adriano before I could finalize and send the summary. Then the next day, we had to interview an additional witness. On Friday I sent Adriano a draft of the investigation summary that was as close to final as I could get it without Adriano's input, and she never responded to me. I wanted her to add her portion to the body of the summary and send it back to me along with her notes; only then would I have been able to write the final summary and then send it to Elad with both her notes and mine attached. Instead of responding to me, Adriano finished writing the summary, and she emailed it to Elad. Adriano claimed I erred by failing to submit my investigation notes when I sent her my summary, but that is only something we do when sending a final investigation summary. What I sent Adriano was only a draft, because she did not have her piece ready yet. Plus, I had previously sent my investigation notes to Adriano, so there was no reason to send them again as an attachment to the draft of the summary.
- 96. Adriano also wrote that the summary was defective because it did not include a section describing the employee's prior DA history. App. 265. However, the new template we were using for investigation summaries, which she approved, did not include such a section. Furthermore, several weeks earlier, Adriano sent me an investigation summary she wrote, and

she told me I should use it as a guide when drafting my summary. This guide she sent me did not include a section for the employee's prior DA history. App. 176-178.

- 97. The 90 Day Review said I met expectations with respect to Attendance. App. 266.
- 98. Under time management/effective work habits: (a) Adriano reiterated erroneous criticisms concerning the Monisha and Brittany investigations; and (b) she again said I missed the deadline for the Monisha investigation (ignoring her delay answering my question that morning) and missed the EOD deadline for the talking points which I didn't miss. App. 266.
- 99. Regarding "timely follow up," she discussed some things I have previously addressed. App. 266. It also says: "DA's being completed within 24 hours." App. 266. If she meant to say I was not meeting this expectation, she is wrong, I was meeting this expectation. At no point during the PIP before now had anyone claimed I took longer than 24 hours to a DA.
- 100. In "Thoroughness and Quality of Work," Adriano repeats the false accusation about failing to follow an instruction concerning the Monisha summary (it was the Leavell summary, and I followed the instruction) and she again accused me of mistakes regarding the Brittany Brodie summary that were not mistakes. App. 267. The next part about changes that needed to be made to the talking points "to make them business presentable" (App. 267) is a fabrication. Stephanie asked me to get her "something," which I did, had Adriano review, and I submitted. No one said I needed to send something to Elad in a certain format or a certain font.
- 101. The next point about teamwork in completing administrative tasks (App. 267) had not been discussed since the March 8 meeting where Adriano acknowledged that I was doing more and thanked me for it. It's not true that I failed to meet an expectation in this area at any time thereafter.

102. Furthermore, the statement in this document about the total number of DAs at the Lewisville location is not credible. The document says there were 568 DAs for this site in March/April. App. 267. If true, that would mean that more than two-thirds of the employees there were issued a disciplinary action during a two-month period. During all the years I worked at Lewisville, there were consistently fewer than 100 DAs in any given month, far fewer than 100 in most months.

April 19, 2016

- 103. On April 19, 2016, I sent an email to Pamela Blackburn once again asking for her to intervene. I attached the documents handed to me at the April 15 meeting, to which I had added my notes and comments. A true and correct copy of this email is attached, pages are marked App. 269-279.
- 104. Later that day, Adriano and Elad told me my employment was being terminated. I went back to my desk and Adriano handed me an empty box. A security guard walked me outside and all the way to my car.

Final Observations

- 105. My performance was as good as or better than any other HRBP in the company, but other HRBPs were treated better than I was. From December 1, 2015 through April 19, 2016, no other HRBP was put on a PIP and falsely accused of things that were not true, and none were fired except me. I was the only HRBP that was pregnant during this period.
- 106. Santander claims that Sabrina Boyd replaced me. Sabrina Boyd was not pregnant at the time of my termination, so if this is true, I was replaced by an employee who was not pregnant.

- 107. Santander claims that several female employees were treated well during their pregnancies. Maybe they were, but none of them worked for Adriano or Elad during their pregnancies, so the positive experiences of those other employees seem irrelevant.
- 108. In Defendant's brief, it says Elad and Adriano "identified Mathew's performance failures in the following areas." Taking these one at a time:
 - a. "providing detail in the work she submitted." This might be a reference to the termination request they criticized as vague, but that issue (discussed above in paragraph 52) was not discussed at all on April 15.
 - b. "submitting accurate work product." We had no discussion about this on April 15.
 - c. "meeting deadlines." Possibly a reference to the Monisha and Brodie summaries, already discussed.
 - d. "timely following up when working on a project." We had no discussion about this on April 15.
 - e. "providing thorough and quality work product." We had no discussion about this on April 15.
 - f. "contributing to the team by completing administrative tasks as needed." There was no discussion of this issue at the April 15 meeting. This was not discussed again after the March 8 meeting when they acknowledged I was meeting expectations in this area.
- 109. Next, the brief says that in the April 15, 2016 meeting, "They also informed Mathew that they felt she did not meet expectations in her consulting, as exemplified by:

- a. "failure to push back on the business when necessary to complete her job." We had no discussion about this on April 15, and I have no idea what they might be referring to here.
- b. "demonstrating a lack of accountability for her own behaviors." We had no discussion about this on April 15. Furthermore, with respect to the times where I agreed I could have done better, I admitted to it and accepted responsibility (see the Timeline, November 6, 2015 and November 23, 2015, first paragraph).
- c. "inappropriately addressing the business clients after they provided Ms. Perez with negative feedback regarding her performance, by challenging the feedback the business clients provided to Ms. Perez." Elad and Adriano accused me of this in the January 15, 2016 earlier meeting, but it was not discussed on April 15. When the accusation was first brought up, I disputed it and I asked who had I supposedly approached. They never gave me a name.
- 110. Next, the brief talks about feedback they received from business clients. They did not say who made these comments or when. I was doing all of my DAs within 24 hours, so I dispute the comment about getting them in 48 hours, if that person was talking about me. These are not valid or accurate criticisms of my performance. Without more details I can't refute the specifics, but Santander has not given me any details about these comments even though I asked them to do so in discovery.
- 111. Santander claims I was defensive in the April 15, 2016 meeting, but I was not. In all meetings after December 1, 2015, I resolved to maintain my composure and stick to the facts. In many instances I pointed out that things they were saying were not true, but I was calm and stuck to the facts. I never claimed I was getting picked on.

112. I accepted responsibility for my actions when the criticisms aligned with the facts, but I did not accept their false and misleading accusations. I never said Adriano was a bad manager. I never said she failed to check my work, that she did not ensure I met my deadlines, and I did not say that she did not often enough help me or remind me of things.

[signature page follows]

I declare under penalty of perjury that the foregoing is true and correct

Executed on September 2024

Reena S Mathew

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 37 of 377 PageID 862



Job Title: Human Resources Business Partner

Job Code: TM0003 Classification: Exempt Job Level: III Department: HR

Reports to: Manager, Human Resources

Grade: 9

Summary of Responsibilities:

The Human Resources Business Partner (HRBP) collaborates with the business and HR team to implement HR initiatives in line with the organization's strategic objectives. By developing strong internal client relationships, the HRBP helps drive people management initiatives. Key responsibilities will include providing HR consultation, policy interpretation, strategic planning, and administering HR projects and program implementation for assigned business units.

Essential Functions:

Assists with all human resources functions, including but not limited to:

- Builds collaborative relationships and gains credibility with operational management and associates to identify HR needs and work collaboratively to implement ideas and strategies
- Proactively minimizes legal risk by ensuring clients' compliance with company policies and procedures. Makes recommendations, provide solutions, and resolve issues as challenges arise
- Provides expert advice to local management on a range of individual and collective HR issues in accordance with company policies, procedures and Best Practice to deliver solutions on employment issues
- Seamlessly executes a full range of duties aligned to deploy HR Strategy and objectives into client group
- Leads employee relations for the organization including coaching on HR related issues, disciplinary actions, HR investigations, and separation
- Contributes to the development of HR policies which are aligned to business goals and legal requirements
- Analyzes HR data for client group/business area to identify opportunities for improvement and implements solutions to enhance service quality and cost effectiveness (i.e.: Labor Turnover trends, absence management, etc.) Identifies training needs within business area and works with Talent Solutions to ensure availability of associate development is aligned to functional and organizational objectives
- Works with Talent Acquisition to source and attract top talent into business area through targeted recruitment activities (i.e.: Behavioral Interviewing) to ensure improved talent attraction in achieving business goals that model company values.
- Communicates changes/development in operational HR Policy procedures within business area
- Integrates Company Values into all activities to drive alignment and organizational improvement through inspiring and motivating people
- Educates business area to drive employee support requirements through self-service
- Collaborates with other HR Operations Partners to ensure coordination, consistency and cultural sensitivity in the delivery of all HR related activities
- Assists in ongoing administration of recordkeeping in associate files as well as HR system of record
- Assists, supports and administers reward and recognition programs, new employee orientation / welcoming programs as needed

Human Resources Business Partner - Page 1

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 38 of 377 PageID 863



Fosters strong partnership with HR colleagues to support all HR strategies

Other Functions:

- · Special projects as required
- Performs other duties as assigned
- · Facilitate and/or train as needed

Requirements:

- Bachelors Degree in Human Resources or related field required; Continuing education as required to stay abreast of legal issues is required
- Four (4) to six (6) years human resource related experience as an HR business partner, generalist or specialist; strong business acumen is required; Certification in human resources is desired (PHR, SPHR)
- Must be an effective verbal and written communicator with strong interpersonal, problem solving and conflict resolution skills
- A flexible and professional approach to an evolving and dynamic environment is essential.
- Successful track record of delivering superior client service
- Demonstrated ability to work under pressure, appropriately prioritize and organize work effectively.
- Excellent Microsoft Office skills required; HRIS (PeopleSoft) and ATS knowledge strongly preferred
- Must have ability to maintain confidentiality

Working Conditions:

- Extended working hours may be required as dictated by management and business needs.
- Travel to multiple facilities may be required.
- May be required to lift, push, or pull materials weighing up to twenty (20) pounds.
- May be required to sit and review information on a computer screen for long periods of time.
- May require repetitive motions of the hands and wrist related to writing and typing at an electronic keyboard.
- Corporate / satellite office role.

Employer's Rights:

This job description does not list all the duties of the job. You may be asked by your supervisors or managers to perform other duties. You will be evaluated in part based upon your performance of the tasks listed in this job description.

The employer has the right to revise this job description at any time. This job description is not a contract for employment, and either you or the employer may terminate employment at any time, for any reason.

Associate Name (Printed)		Associate Signature	Date

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 39 of 377 PageID 864



Revision History

<u>Date</u>	Version #	<u>Change</u>	Ref. Section	Amended By
3/20/2013	1.0	New	All	H. Hole
9/12/2014	1.1	Grade increase (to reflect	Pay Grade	A. Lovelle
		current grade)		

Cas

Case 3:23-cv-01494-Na Document 36 Filed 09/20/24

Pago 15 Mid-Year Review (Non-Managers)

Organization: Angelina Hullum Supervisory

Location: Lewisville

01/01/2015 - 12/31/2015

HR Business Partner Manager: Angelina Hullum

Evaluated By: Angelina Hullum

Overall

Manager Overall Evaluation

Comment:

Continue to push herself to be better. Look for ways to make the LEW site more efficient, train the new managers, and look for trends in the GITK.

Employee Overall Evaluation

Comment:

Continue to monitor daily activities and ensure they align with overall goals such as maintaing compliance, reducing risk and pressing towards career growth goal. In order to do this keep regular pulse with the business whether that is attending meetings or having one on ones. Also, provide comprehensive and timely follow up for any issues/inquiries that arise. Continue to look at processes/policies/GITK (for patterns) and see how they can be streamlined or if on the other hand there are things that are lacking, what can we do to improve the business.

07/08/2015

Acknowledgment

M	9	n	9	a	0	r
IVI	а		0	u	.	

Entered by: Angelina Hullum

Acknowledge Review

Comment: completed

Employee

Status:

Entered by:

Date:

Date:

Status: Comment:

Goals

Actively drive, support and enforce risk management standards

Ensure all Advocacy business processes, policies and procedures support regulatory mandates and reduce unnecessary risk to the Associate and the business. Support all compliance related initiatives in relation to Advocacy, Identify potential compliance concerns and surface to HR Compliance, Ensure that my team responds to all Compliance related requests timely and accurately

Due Date: 12/31/2015 Status: In Progress Completion Date:

Manager Evaluation Employee Evaluation

Reena stays on top of all compliance issues and is timely As compliance issues come up, we as Advocacy stay when returning any risk event information back to Compliance on top of these and are extra attentive since these

types of issues are what can affect the business in a very negative way. This may include Information Security, compliance with regulatory training or even 19's.

Create and share reporting to educate business partners on HR trends

Create spreadsheet (using "Get In The Know" format) on a quarterly basis to review trends and any areas of concern regarding demographics, salary and turnover. Once information is compiled, present it to the business.

Due Date: 12/31/2015 Status: In Progress Completion Date:

Manager Evaluation

Would like to see Reena pull information in order to become more strategic with her business partners and identify trends. With her tenure and knowledge, she can provide valueable recommendations to the business leaders.

Employee Evaluation

In the process of starting this quarter's GITK. Now that we are aware of how to pull the data, we need to extract questions from business to see what all they would like to see as well.

Develop processes to develop the skill set of our leaders.

Meet with new managers who become part of SCUSA (either through promotion or external hires) and sit in on side by sides, attend jumpstarts during their first 3-6 months in role. Follow up with HR management/Talent Development and department leadership at the end of each quarter to discuss strengths/weaknesses, concerns, and recommendations.

Due Date: 12/31/2015 Status: In Progress Completion Date:

Manager Evaluation

Would like to see more progress in this area. We have many new managers that need training and guideance. Reena needs to spend more time on the floor with all managers.

Employee Evaluation

Early Stage here in Lewisville just hired four managers and will start initiating side by sides, attending their jumpstarts and even provide quick training if needed ie Kronos, WD etc.

Develop updated investigation matrix along with taskforce team.

Create investigation matrix that will be used internally via HR to determine who would be involved in regards to management in different issues/scenarios per the DA matrix. Matrix will also specify HR involvement and who the issue would be escalated to in the case it needed to be investigated.

Due Date: 06/30/2015 Status: In Progress Completion Date:

Manager Evaluation Employee Evaluation

This goal is almost complete. Looking forward to the final product.

We are in the final phase of wrapping up the document that is part of lsight to ensure that the HR team is communicating as much as possible with the business when it comes to specific issues/investigations that come up.

Initiate rollout of anti-bullying campaign along with taskforce team.

Formulate rollout of anti-bullying campaign and the different facets including presentation, guest speaker, maintenance-post rollout. Find a motivational speaker who is able to speak to the topic of bullying and the impact it has not only to the company, but to employee morale and ultimately our bottom line.

Due Date: 07/31/2015 Status: In Progress Completion Date:

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 42 of 377 PageID 867

Manager Evaluation

Employee Evaluation

We have made progress, but have a lot more work to do in this area. would like to see more ideas and progress in this area now that we have more HR support. We've definitely made progress on this project as far as coming up with a theme, time (August/2015) and possible guest speaker. Upon announcing the roll out in a manager meeting, management was very excited to hear about the project and expressed interest in assisting as well.

Section Summary

Manager Evaluation

Employee Evaluation

Reena does a great job with her day to day duties. I would like to see her spend more time training our managers and working on her projects.

Competencies

Results Orientation

For a description of Results Orientation, please refer to the Competency Description link above.

Manager Evaluation

Employee Evaluation

Ensure we are getting the results we desire by partnerning with the business and providing them the customer service and the follow up that they need. Continually communicating and completing tasks such as reports, investigations, answering inquiries and assisting with DA/terminations if applicable.

Collaboration

For a description of Collaboration, please refer to the Competency Description link above.

Manager Evaluation

Reena does a good job collaborating with members of our team. I would like to see her branch out to other members of HR advocacy.

Employee Evaluation

Collaboration is a daily task whether it be with Payroll, Benefits, or HRIS or other team members. We are constantly collaborating in ways to streamline processes or communicating with one another in our own department for best practices.

Interpersonal Savvy

For a description of Interpersonal Savvy, please refer to the Competency Description link above.

Manager Evaluation

Employee Evaluation

Reena does an excellent job of building rapport with all levels In order to collaborate, it's important that you have of employees. She is trusted and always professional. interpersonal skills to compliment that collaboration

In order to collaborate, it's important that you have interpersonal skills to compliment that collaboration. On a daily basis we are in constant communication whether that's with the site director, eachother or one of our associates answering an inquiry. Building rapport on a daily basis, we try and build an atmosphere of trust and integrity so that each interaction with HR brings more credibility.

Section Summary

Risk Objectives

Risk Objective: Policies/Procedures (Operating)

Adheres to standard operating procedures and raises issues or concerns when gaps exist in processes, procedures, policies, etc.

Manager Evaluation Employee Evaluation

Risk Objective: Policies/Procedures (Organizational - Self)

Adheres to all organizational policies and procedures applicable to their role in SCUSA (Assigned Compliance, HR, etc.)

Manager Evaluation Employee Evaluation

Risk Objective: Compliance Training (Self)

Completes all assigned SCUSA compliance training within established time-frames.

Manager Evaluation Employee Evaluation

Section Summary

Manager Evaluation

Reena maintains consitancy when applying policy/procedure. She completes her compliance training as scheduled. She works with Compliance to minimize risk when necessary.

Employee Evaluation

Being a part of financial company which has now gone public, it's imperative that we keep abreast of federal laws/regulations that keep our company compliant. Being in the HR department is a vital part of that compliance whether it be maintaining consistency from an HR standpoint, being familiar with our policies and procedures and regular mandatory participation in quarterly compliance courses. On target for these objectives and adhere to them on a daily basis.

Development

Additional Information:

Long term: Breaking down barriers

Continue to work on identifying issues at different levels of the business and being able to

problem solve whether that be a Facilities issue or a strategic operations issue. Being able to

adapt to all levels and foresee issues/change.

Status: In Progress Relates To:

Long term: Sr. HR Business Partner

Additional Information:

Become more HR savvy in order to take the next step of growth which would be a Sr. HR

Business Partner. Became PHR certified and am now ready for the next step professionally.

Status: In Progress Relates To:

Short Term: Attend more HR meetings outside of SCUSA

Additional Information:

Attend more Dallas HR meetings/SHRM meetings in order to be abreast of laws and

changes that are being made to the HR industry.

Status: In Progress Relates To: Collaboration

Short term: Attend more Internal meetings Filed 09/20/24 Page 44 of 377 PageID 869

Additional Information:

Attend more internal meetings such as jumpstarts and side by sides to get a better understanding of the business and to learn more about the auto finance industry as a whole.

Status: In Progress

Relates To: Collaboration

Section Summary

Manager Evaluation

Reena can continue her growth this year by focusing on helping new managers develop and by working on completing her goals/projects. I encourage her to step out of her comfort zone and find ways to take herself to the next level

Employee Evaluation

Building rapport with different parts of the business and continually trying to improve and enhance relationships.

Taking on extra projects to try and learn new areas of the business as well as enhance knowledge of HR for long term career growth. Attended meetings via Dallas HR to obtain additional knowledge and learn about the current laws and updates and additionally network with other HR professionals. Have been consistently attending jumpstart/AVP/manager meetings in order to answer any questions as well as learn the business from different perspectives and to have a better understanding of the overall operations of our department.

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 45 of 377 PageID 870

From: Stephanie Elad < selad@santanderconsumerusa.com>

To: Angelina Turilli <aturilli@santanderconsumerusa.com>

Cc: Dana Hawkins dhawkins@santanderconsumerusa.com, Jessica Gleason

<igleason@santanderconsumerusa.com>, Jonathan Morse

<JMORSE@santanderconsumerusa.com>

Subject: RE: Termination Tyrone Wilson [C] (Contract Ended) - Effective Date 2015 01 14

Date: Thu, 22 Jan 2015 21:19:49 +0000

Importance: Normal

Let's revisit tomorrow when we have the entire team together.

From: Angelina Turilli

Sent: Thursday, January 22, 2015 3:18 PM

To: Stephanie Elad

Cc: Dana Hawkins; Jessica Gleason; Jonathan Morse

Subject: RE: Termination Tyrone Wilson [C] (Contract Ended) - Effective Date 2015 01 14

I have met with Reena, however I have noticed Fatma has been responding to these today as "got it". Do we need to revisit?

From: Stephanie Elad

Sent: Thursday, January 22, 2015 3:17 PM

To: Angelina Turilli

Cc: Dana Hawkins; Jessica Gleason

Subject: RE: Termination Tyrone Wilson [C] (Contract Ended) - Effective Date 2015 01 14

Thanks! As we discussed, I would just have a conversation with Reena. This is a new process so I know we are going to have a few bumps.

Jess and I talked earlier – I understand this has been an ongoing issue. As a long term fix, let's have Melissa just process all of the terms due to contract/assignment ending and advise the appropriate business partner once the term has been processed. Please review with Melissa tomorrow and let's also inform the team during our meeting.

Thanks!

From: Angelina Turilli

Sent: Thursday, January 22, 2015 2:52 PM

To: Stephanie Elad **Cc:** Dana Hawkins

Subject: RE: Termination Tyrone Wilson [C] (Contract Ended) - Effective Date 2015 01 14

From: Stephanie Elad

Sent: Thursday, January 22, 2015 8:07 AM

To: Angelina Turilli **Cc:** Dana Hawkins

Subject: Fwd: Termination Tyrone Wilson [C] (Contract Ended) - Effective Date 2015 01 14

Can you fook into this y-01494-N Document 36 Filed 09/20/24 Page 46 of 377 PageID 871

Sent from my iPhone

Begin forwarded message:

From: Dana Hawkins < dhawkins@santanderconsumerusa.com>

Date: January 22, 2015 at 7:53:43 AM CST

To: Stephanie Elad <<u>selad@santanderconsumerusa.com</u>>, Jessica Gleason

<jgleason@santanderconsumerusa.com>

Cc: Dana Hawkins < dhawkins@santanderconsumerusa.com>

Subject: FW: Termination Tyrone Wilson [C] (Contract Ended) - Effective Date 2015 01 14

Good morning,

This termination was processed on 1/21/2015 with an effective date of 1/14/2015. Melissa Lawson completed the term process in Workday. Please provide a timeline of events including:

- ? When we were notified of the term 1/14/15 at 12:22 pm
- ? Who notified us of the term Vanessa Trevino
- ? Any remediation efforts Melissa sent to Reena and Dean at 12:30pm

Reena was sent the email, and asked to show Dean how to process a term. Reena missed the email. Melissa received a second email on 1/21/15 stating that the term had not been processed, so she went in and immediately processed the term. This happened prior to our added the process to have HRBPs sending a notification to Melissa that they had completed the process. Melissa did not follow up with Reena or Dean to see if the term had been completed on 1/14/15.

Please let me know if you have any questions.

Dana

From: workday@santanderconsumerusa.com [mailto:workday@santanderconsumerusa.com]

Sent: Wednesday, January 21, 2015 2:44 PM

To: Shaquaylon McNuckles

Subject: Termination Tyrone Wilson [C] (Contract Ended) - Effective Date 2015 01 14

Tyrone Wilson [C] (Contract Ended) has been terminated from Workday (employee ID 992790, department 036005 Bankruptcy, effective date 2015 01 14, hire date [not available], Location North Richland Hills, State Texas).

Please remove system access effective immediately.

Business Process: End Contract: Tyrone Wilson [C] (Contract Ended)

Subject: Tyrone Wilson [C] (Contract Ended)

Details: End Contract for Tyrone Wilson [C] (Contract Ended) effective on 01/14/2015

Angelina Hullum

From:

Stephen Shaffer

Sent:

Wednesday, January 27, 2016 8:24 AM

To:

Angelina Hullum

Subject:

FW: Last Chance to Register for February Monthly Luncheon

Attachments:

Ethics in HR - DHR.pdf

Here it is

Stephen Shaffer

Santander Consumer USA Inc. VP Human Resources Business Partnership

PHONE

214.722.4580

MOBILE

469.236.5931

EMAIL

sshaffer@santanderconsumerusa.com

WEB

www.santanderconsumerusa.com

From: Reena Mathew

Sent: Wednesday, January 20, 2016 11:39 AM

To: Stephen Shaffer

Subject: FW: Last Chance to Register for February Monthly Luncheon

Hi Stephen,

Thank you again for meeting with me today. I wanted to send you the whole email with the attachment included.

As I mentioned, this goes against the first bullet on my timeline and it's inaccurate as the information requested is below. I will send you a document recapping my understanding of the conversation we had today, but again, I don't agree with the majority of the items (I take ownership of two of them listed) that were listed on the timeline.

I thank you for your time this morning but truly do hope you take some of my feedback as an associate in HR so someone else doesn't go through something as disheartening as this. I truly loved coming to my job but this has taken a toll on me especially since I cannot agree with the majority of the statements (some are completely untrue ie the first bullet) being made and how this whole thing was handled from the onset.

I will most definitely do my part to work through this and meet the objectives that management has set, but if someone is going to be formally managed for performance, they need to be clearly aware of what is going on before it gets to this point.

Thanks again, Reena

From: Reena Mathew

Sent: Thursday, February 12, 2015 4:32 PM

To: Angelina Turilli

Subject: RE: Last Chance to Register for February Monthly Luncheon

Hi Lina,

Attached is the PPT. It was a great topic--Ethics and how it relates to HR and what our duty is to the company. As HR professionals, we are all put in situations where ethics may be questionable and we have to be able to discern whether or not something is right or wrong. We then have to decide what we are going to do from that point to correct the issue so it falls in line with our objectives and our mission statement as a company. Ethics flows from the top to the bottom so if you have an ethical person at the top of any org/dept, the same values will flow down. The same is true for the opposite as well. There are times too when we feel something is right isn't legal so we have to ensure we as HR professionals stay the course of what's legal. It can be a fine line, but in the end we have to ask ourselves questions of how our decisions affect not only us, but the dept, employees and company as a whole.

Let me know if you need anything else ©

Thanks, Reena

From: Angelina Turilli

Sent: Wednesday, February 11, 2015 2:46 PM

To: Reena Mathew

Subject: RE: Last Chance to Register for February Monthly Luncheon

I would love to see the ppt as well, however what I'm looking for is a summary from you, particularly what you got out of the seminar.

From: Reena Mathew

Sent: Wednesday, February 11, 2015 12:59 PM

To: Angelina Turilli

Subject: RE: Last Chance to Register for February Monthly Luncheon

Will do Lina! Would it be ok if I provide a copy of the ppt?

From: Angelina Turilli

Sent: Wednesday, February 11, 2015 12:54 PM

To: Reena Mathew

Subject: RE: Last Chance to Register for February Monthly Luncheon

Reena.

In an effort to ensure that these luncheons are beneficial and providing value to you and the business, please provide a summary of what you learned from attending the luncheon.

Thank you,

Angelina

On Feb 5, 2015, at 10:52 AM, Reena Mathew < rmathew@santanderconsumerusa.com > wrote:

HI Lina,

Would it be ok if I attend the Dallas HR luncheon next week?

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 49 of 377 PageID 874

Thanks, Reena

From: DallasHR [mailto:info@dallashr.org]
Sent: Thursday, February 05, 2015 9:17 AM

To: Reena Mathew

Subject: Last Chance to Register for February Monthly Luncheon



February 5, 2015

Ethics: The Foundation of Human Resources Management

February Monthly Luncheon

Tuesday, February 10 | 11:30 AM - 1:15 PM | Register now Registration closes Friday, February 6 at noon SHRM Professional Development Credits: 1
HRCI HR (General) Recertification Credit Hours:1

What does good business really mean today? What do ethics have to do, if anything, with good business? What impact can the human resource function have on good business and ethics? Within business, what is my responsibility as a human resource professional?

These questions are really simple to ask – yet complicated to answer. In business today, human resource professionals are frequently asked to answer these questions and significantly contribute to their organization's ethical integrity. As advocates for both the employer and the employees, human resources professionals make ethical decisions almost daily that impact their entire organization, either positively or negatively and are required to commit to a high standard of professional responsibility.

Learning Objectives:

- ? Expand your insight into the realm of business ethics by examining social, ethical and political issues confronting modern organizations from both internal and external stakeholders' viewpoints.
- ? Analyze ethical dilemmas and learn to apply a clean process of moral decision making in business.
- ? Gain expanded awareness and practical tools for championing the highest possible level of ethics for all organizations.

Full Details

Human Resources 101

The Layperson's Short Course on Applied Employment Law | Monday, March 2 | 9:00 AM - 4:30 PM

Understanding the Process of Effective HR Practice | Tuesday, March 3 | 9:00 AM – 4:30 PM

SHRM Professional Development Credits: 6 per day

Quick Links

- February Monthly Luncheon
- Human Resources 101
- Recruiting Team of the Year
- Third Thursdays Networking
- PHR/SPHR Exam Study Group
- Online Learning Center
- New Mailing Address
- Help a Member

Third Thursdays

Maximize Your Membership A Networking Reception

Thursday, February 19 5:30 PM - 7:30 PM DallasHR Office

Complimentary drinks and snacks. Open to all current and prospective members.

Add to calendar

PHR/SPHR Exam Study Group

HRCI HR (General) Recertification Credit Hours: 6 per day

This critically acclaimed business seminar provides an opportunity to gain the legal knowledge and practical skills to help individuals new to the HR field. The program is paced for anyone with new HR responsibilities including non-HR managers and supervisors, department secretaries, administrators with HR responsibilities, administrative assistants, or anyone who has an interest in gaining HR knowledge and skills. This course is organized to give you what you've been looking for - clear, concise information that gives you the practical do's and don'ts of smart employee management.

Full Details



Recruiting Team of the Year Awards Presentation

Thursday, February 19 | Happy Hour & Networking 5:30 PM | Awards 7:00 PM

Presented in partnership by <u>DFWTRN</u> and <u>DFW SMA</u>, a member services area of DallasHR, the Recruiting Team of the Year event will recognize and celebrate the efforts of successful talent acquisition teams. Complimentary drinks and appetizers will be provided.

Full Details

This event sponsored by:

Silver Sponsor



HIGH PROFILE

Hiring Excellence

Thank You to Our Strategic Sponsors

SUPPORTER LEVEL





CONTRIBUTOR LEVEL.





All. Together. Certain.

SPRING 2015 Study Group

Tuesday Evenings February 24 - April 14 6:00 PM - 8:00 PM

Hurry! Class is limited to the first 40 registrants.

Online Learning Center

HRCI-approved education at your fingertips - anytime, anywhere, at your convenience!

More info...

We've moved!

New mailing address for DallasHR and The **HRSouthwest Conference**

5001 LBJ Fwy, Ste 800 Dallas, TX 75244

All other contact information remains the same.

Help a Member

Our company is looking to enhance our current member referral program. If you have an active program, please briefly explain how it works and what incentives your employees have to refer candidates.

View discussion thread...

Angelina Hullum

From:

Angelina Hullum

Sent:

Thursday, December 17, 2015 2:06 PM

To:

Angelina Hullum FW: Reena - Dr. Appt.

Subject:

From: Kristen Lagunes

Sent: Wednesday, July 01, 2015 12:30 PM

To: Angelina Hullum Subject: Reena - Dr. Appt.

FYI – just for your records.

From: Kristen Lagunes

Sent: Wednesday, July 01, 2015 12:00 PM

To: 'Reena Mathew'

Subject: RE: Missed conversation with Reena Mathew

Hey Reena, just saw this – is Sabrina there to help cover?

From: Reena Mathew [mailto:rmathew@santanderconsumerusa.com]

Sent: Wednesday, July 01, 2015 9:18 AM **To:** Reena Mathew; Kristen Lagunes

Subject: Missed conversation with Reena Mathew

rmathew@santanderconsumerusa.com [9:16 AM]:

GM Kristen! I have a Dr's appt this afternoon.....would it be ok if I left at 1p and checked emails from my phone for the rest of the afternoon?

Angelina Hullum

From:

Angelina Hullum

Sent:

Thursday, December 17, 2015 2:12 PM

To:

Angelina Hullum

Subject:

FW: Reallocation of duties

Follow Up Flag:

Follow up

Flag Status:

Flagged

From: Angelina Hullum

Sent: Friday, July 10, 2015 2:22 PM

To: Reena Mathew

Subject: Reallocation of duties

Reena,

To recap our conversation, you will be taking over the following departments in LEW effective immediately, to include the Credit Card Department at 8585. The expectation will be for you to spend every other Friday at 8585 to support the Credit Card Department. Let me know if you have any questions.

Thank you for your support and flexibility.

Mark Mooney	047	Reinstatements	
33		CC Reinstatements	
		Recovery Operations	
		Dealer Control	
		Collateral Recovery	
		CC Coll Recv	
		Non Collateral Deficiency	
		Vendor Oversight	
		CC Vdr Oversight	

Doyenard	031	Dialer Administration
8		Business Process Optimization
		Operational Analytics

Linda Vrazel	031	Quality Assurance	
35		Operational Training	
		CC Dealer Advocacy and Maintenance	
		Credit Bureau Advocacy	
		Advocacy Analytics	
		Customer Advocacy	

Scott Dieckman		
65 (8585)	047	Unsecured Credit Card

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 53 of 377 PageID 878

James Hart	031	Quality Control	
2		Strategic Operations	

Kim Thorndyke	046	Customer Service
81 (Sabrina)		Customer Service Operations
	Y MANAGEMENT	OSP Vendor Management
		CC Customer Service Support

Wayne Nightengale	049	Late Stage
530		Early Stage
		CC Late Stage
STATE OF STA		CC Early Stage
		Collections Operations

Total 673

Angelina Hullum, PHR

Santander Consumer USA Inc. Manager, Human Resources

PHONE

214.261.1501

OBILE

720.369.7019

FAX

720.377.3010

EMAIL

aHullum@santanderconsumerusa.com

WEB

www.santanderconsumerusa.com

^{**(}not counting 81 in CS)

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 54 of 377 PageID 879

From: Yessica Adriano < YADRIANO@santanderconsumerusa.com>

To: Tina Mohan <TMOHAN@santanderconsumerusa.com>, Hortensia Perez

<hperez@santanderconsumerusa.com>

Subject: FW: HR Org Change Announcement **Date:** Mon, 24 Aug 2015 16:59:02 +0000

Importance: Normal

Attachments: HR Org Chart August 2015.pptx

FYI- info shared with the business

From: Stephanie Elad

Sent: Monday, August 24, 2015 9:16 AM

To: Scott Dieckmann; Mark Mooney; Mark Nerios; Antoinette LaRosa; Brad Denetz; Graham Anderson; Brad Quick; Kimberly Thorndyke; Cory Overman; Dominique Doyenard; Tamika Carr; Linda Vrazel; James Hart; Erica Barton **Cc:** Angelina Hullum; Yessica Adriano; Kristen Lagunes; Jessica Gleason; Pamela Blackburn; Troy Miller; Wayne

Nightengale; Mark Smith; Brent Huisman; Jonathan Morse

Subject: HR Org Change Announcement

For our call today.

In an effort to more effectively support the business, the HR Advocacy team has realigned our team structure. This means that we will now have a dedicated team to support each site, vs. being aligned by EVP/SVP. The new structure is as follows:

NRH – Angelina Hullum will be the HR Manager, dedicated solely to this site. She will no longer have responsibility for Servicing at all sites, but will instead manage all HR matters at NRH. Reporting to Angelina are:

Whitney Andres, HR Business Partner, (who will continue to support Servicing)

Misty Donnell, HR Business Partner (who will support Strategic Ops)

Jeanette Rodriguez, HR Generalist

Nicole Heinicke, HR Generalist

Also reporting to Angelina will be *Kristen Lagunes*. You are all aware that Kristen joined SCUSA earlier this year as an HR Manager. Kristen will be transitioning to a Senior HR Business Partner role, at her request, to remain at NRH and support that site. We are excited to be able to leverage Kristen's experience and skill set for escalated Employee Relations issues and special projects.

Angelina's experience with SCUSA, first in CO, and now in TX, positions her well to lead the NRH HR team and support our largest site, especially with the upcoming remodel. Angelina will continue to report to me.

LEW – I'm pleased to announce that Yessica Adriano will be transitioning to the LEW site as HR Manager. Yessica joined SCUSA earlier this year as an HR Manager supporting Funding and Credit, and has done a great job assimilating to the organization. Yessica will continue to support the 8585 site as well, until further notice. Reporting to Yessica will be:

Hortensia Perez, HR Business Partner Reena Mathew, HR Business Partner Sabrina Boyd, HR Generalist

Yessica will be responsible for all HR activities at both LEW and 8585.

CO – I'm also pleased to announce that *Kayla Liggett* will join SCUSA as the HR Manager for our CO site. Kayla comes to SCUSA with experience in the retail and collections arenas and will be a strong addition to our team. She will have responsibility for all HR matters at the CO site. Reporting to Kayla is:

Kayla will report to me.

THX – Jonathan Morse will continue to serve as HR Manager for Thanksgiving Tower and will manage all HR activities at that building. He will take over the support of all departments physically located at the Tower, that are currently being supported by my team, in addition to all of the Back Office departments that he currently supports. Reporting to Jonathan is:

Senior HR Business Partner – Open HR Business Partner – Tina Mohan HR Business Partner – Augie Pastrana HR Business Partner – An Vo HR Generalist – Fatma Rizvan

Jonathan has been in the HR Manager role for a year now and has done a great job leading his team and working with the business. He is well positioned to take on this additional responsibility. He will continue to report to Jessica.

All of these org changes, as well as Kayla's start date with SCUSA, are effective 8/31.

Additionally, Jessica and I wanted to inform you that as part of the restructure, and to better reflect the level of support that our teams will be providing to yours, we will now refer to all of those that serve on our teams as "HR Business Partners". This will replace our former "Advocacy" title, which we are phasing out. I will explain in more during our scheduled call, so that you all understand what exactly this means, what remains the same and what will be somewhat different.

I will continue to support all EVP's and SVP's under Brad Martin's org, and Jessica will continue to support all other C-level executives and their direct reports.

Regards, Stephanie

Stephanie Elad, SPHR

Santander Consumer USA Inc. Director, Human Resources

PHONE 214.237.3713 MOBILE 214.695.1278

EMAIL <u>selad@santanderconsumerusa.com</u>
WEB www.santanderconsumerusa.com

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 56 of 377 PageID 881

From: Yessica Adriano < YADRIANO@santanderconsumerusa.com>

To: Reena Mathew <rmathew@santanderconsumerusa.com>

Subject: Re: PTO Request

Date: Thu, 03 Sep 2015 17:26:17 +0000

Importance: Normal

Hi Reena, that is fine, may you please input the dates into my calendar.

Have a safe trip!

Sent from my iPhone

On Sep 2, 2015, at 12:27 PM, Reena Mathew < <u>rmathew@santanderconsumerusa.com</u> > wrote:

Hi Yessica,

Before I forget, could I please request to have 9/18, 9/21 and 9/22 off?

Also, would it be ok if I work a half day this Friday? We are doing some traveling this wknd and next ©

Thanks!

Reena

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 57 of 377 PageID 882

From: "Reena Mathew" <rmathew@santanderconsumerusa.com>

To: "Yessica Adriano" < YADRIANO@santanderconsumerusa.com>, "Reena Mathew"

<rmathew@santanderconsumerusa.com>

Subject: Conversation with Yessica Adriano

Date: Thu, 17 Sep 2015 17:59:20 +0000

Importance: Normal

Reena Mathew [9:28 AM]:

Yessica, quick question....

Yessica Adriano [9:28 AM]:

yes maam

Reena Mathew [9:29 AM]:

Would you mind if I left a little early today (I'll still answer emails from my phone)? Reason being is we have a 7am flight (I know! lol) and I still have a few things to do....

Yessica Adriano [9:43 AM]:

Hi Reena, how early did you want to leave..\

Reena Mathew [9:51 AM]:

Would 1 or 2p be ok?

Reena Mathew [10:59 AM]:

Is it ok if I send Dana an email re: the dates and cc you?

Yessica Adriano [11:11 AM]:

yes, but please send to Kristy anne thomas

Reena Mathew [11:29 AM]:

k, will do!

Reena Mathew [12:51 PM]:

Darn on the Compliance dates....

Yessica Adriano [12:57 PM]:

no kidding but it was a good proactive approach

Reena Mathew [12:57 PM]:

ty:)

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 58 of 377 PageID 883

From: Yessica Adriano < YADRIANO@santanderconsumerusa.com>

To: Sabrina Boyd <SBOYD@santanderconsumerusa.com>, Reena Mathew

<rmathew@santanderconsumerusa.com>, Hortensia Perez

<hperez@santanderconsumerusa.com>

Subject: Team Meeting Recap

Date: Wed, 09 Sep 2015 18:28:43 +0000

Importance: Normal

Team,

These are some highlights of our discussion yesterday:

Scheduling

Sabrina: 8-5 pm (Tues, Thurs 7:30-4:30)

Reena: 8:45-5:45

Yessica: 8-5pm (Tues, Wed 7:00-4:30)

Ten: 8:30-5:30 pm

8585 Coverage

Ten- Everyday (Base location)
Yessica- Tuesday, Wednesday and as needed
Reena- Twice a Month (9/15, 10/8, 10/23)
Sabrina- Once a Month (9/23, 10/15)

General Team Expectations

- We are a team and need to work as one: sharing the workload and continually helping each other out
- As a company and in an effort to enhance our culture we are moving towards a work/life balance philosophy-which is wonderful. The expectation is not to go home and work, but rather to truly enjoy our time off.

 Therefore, when at work we need to work a full day and ensure we are productive in either handling the day to day issues or looking for new ways to improve our dept, site, or team.
- Open Communication: it is what keeps relationships successful, it important that we maintain honest two way communication

when there is teamwork and collaboration, wonderful things can be achieved." -- Mattie Stepanek

Thank you

Yessica Adriano, SPHR, SHRM-SCP

Santander Consumer USA Inc. Manager Human Resources

PHONE 214.722.5667 MOBILE 214.215.5258

EMAIL <u>yadriano@santanderconsumerusa.com</u>
WEB <u>www.santanderconsumerusa.com</u>

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 59 of 377 PageID 884

From: "Reena Mathew" </O=D6ORG/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=REENA MATHEW0CB>

To: "Yessica Adriano" < YADRIANO@santanderconsumerusa.com>

Subject: Recap of conversation with Deirdre Crouch

Date: Thu, 10 Dec 2015 20:15:08 +0000

Importance: Normal

HI Yessica,

Per our conversation, Tara Stewart and myself met with Deirdre on October 20, 2015 to discuss the concern she had over her attendance write up which initially was incorrect due to the manager keying in her time incorrectly. We started with that and how the Final was actually a Written and that she had used some time after requesting the time off so did not have enough to cover those days which resulted in the Written.

Tara then moved on and said she understood Deirdre had concerns over her relationship with her manager Cherri Cotton and wanted to discuss those. Deirdre stated that she did not know why the DA was only administered on 8/31/2015 and the infraction had happened in early August. Tara assured her it was just an oversight and that she would address the issue with her mgmt. staff. She also stated that Cherri will tell her not to eat at her desk and Tara said that was due to policy and that managers have to manage that. Deirdre stated that she is not consistent and Tara said that she would address that issue as well. Deirdre also mentioned that Cherri is not a bad person, but said that things that Cherri does affects people. Tara and I assured Deirdre we would look into it and asked her if anything further occurred to let HR or Tara know and she said she would. After an hour plus of discussing the issues Deirdre said she felt better and Tara and her hugged.

Tara did follow up with me and stated she did have a conversation with Cherri/Deidre on October 27, 2015 (please see Tara's notes) to address the issues and even followed up with the team and some of the members and no one came to her with any other issues.

Let me know if you need anything else.

Thanks, Reena

Reena Mathew, PHR

Santander Consumer USA Inc. HR Business Partner

PHONE 214.292.2772

MOBILE 214.364.9136

FAX 214.630.0828

EMAIL <u>rmathew@santanderconsumerusa.co</u>m

WEB <u>www.santanderconsumerusa.com</u>

BENEFITS HOTLINE 214.540.2010

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 60 of 377 PageID 885

From: "Reena Mathew" </O=D6ORG/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=REENA MATHEW0CB>

To: "Mitzie Jefferson" <mijefferson@santanderconsumerusa.com>, "Gregory Vinson"

<gvinson@santanderconsumerusa.com>, "Samuel Akins"

<sakins@santanderconsumerusa.com>

Subject: DA's

Date: Wed, 28 Oct 2015 18:05:36 +0000

Importance: Normal

Hi!

Just wanted to let you know that we were at a conference Mon/Tues so please bear with me as I'm catching up and going through emails.

I received several requests for DA's and I will have them ready no later than Friday ©

Thank you for your patience! Reena

From: "Yessica Adriano" < YADRIANO@santanderconsumerusa.com>

To: "Yessica Adriano" < YADRIANO@santanderconsumerusa.com>, "Reena Mathew"

<rmathew@santanderconsumerusa.com>

Subject: Conversation with Yessica Adriano

Date: Thu, 29 Oct 2015 17:19:55 +0000

Importance: Normal

```
Yessica Adriano [9:46 AM]:
```

HI Reena, do you know where we keep personnel files, looking for Delmar Tillis Pip

Reena Mathew [9:46 AM]:

Hi Yessica! I just responded to your email:) It's in Optika....

Yessica Adriano [9:46 AM]:

just saw your response thanks

Reena Mathew [9:46 AM]:

NP, let me know if you need any help!

Reena Mathew [11:07 AM]:

Hi Yessica! AVP Sam Akins sent over a term request for a LEW associate and the associate is in the office today.....how would you like us to handle?

Yessica Adriano [11:07 AM]:

is it for attendance?

Reena Mathew [11:08 AM]:

Yes...

Yessica Adriano [11:08 AM]:

ok i can process it today

Reena Mathew [11:08 AM]:

K, did you need me to do anything?

Yessica Adriano [11:09 AM]:

did we get all approvals

Reena Mathew [11:09 AM]:

Just from Brad....I can send over the term request if that helps?

Yessica Adriano [11:10 AM]:

yes please and ill get the other docs ready, does he want him termed immediately or end of day-

Reena Mathew [11:11 AM]:

Sounds good--let me check...

Wow that was LONG!

Yessica Adriano [11:21 AM]:

it was

Yessica Adriano [11:48 AM]:

Hi Reena, Brad just came into the office, he said they have like 10 pending DAs, im not sure on the validity, but are you working on them? He stated he needs them asap.

Reena Mathew [11:49 AM]:

Yes, and I emailed the AVP's yesterday that we would have them no later than Friday due to me being out on Mon/Tues Reena Mathew [12:16 PM]:

Sam said 3p should work....:)

Yessica Adriano [12:17 PM]:

ok thank you

Reena Mathew [12:17 PM]:

np

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 62 of 377 PageID 887

From: "Reena Mathew" <rmathew@santanderconsumerusa.com>

To: "Yessica Adriano" < YADRIANO@santanderconsumerusa.com>, "Reena Mathew"

<rmathew@santanderconsumerusa.com>

Subject: Conversation with Yessica Adriano **Date:** Mon, 16 Nov 2015 16:20:15 +0000

Importance: Normal

```
Reena Mathew [9:53 AM]:
 Hi Yessica
Yessica Adriano [9:53 AM]:
 Hi reena
Reena Mathew [9:53 AM]:
 I quess everyone has a request today:) Would it be ok if I leave around 3p today?
Yessica Adriano [9:53 AM]:
 yes
Reena Mathew [9:54 AM]:
 Awesome, ty!!
 Appreciate it....
Yessica Adriano [9:54 AM]:
 np
Reena Mathew [10:08 AM]:
 Crap! I forgot we have a PT class starting tonight....ugh: S. I hate to ask, but would you be able to assist Sabrina in
 picking up the pw (it's really quick, I promise!) and she and I will split tomm to complete in Red Carpet?
Yessica Adriano [10:14 AM]:
 yes no issue, what time is that
Reena Mathew [10:14 AM]:
 Thank you!! 5p typically
Yessica Adriano [10:17 AM]:
 ok, good im here till six anyway- i came in at 9:(
Reena Mathew [10:17 AM]:
 Thank you!!! I owe you one....:)
```

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 63 of 377 PageID 888

From: Yessica Adriano < YADRIANO@santanderconsumerusa.com>

To: Reena Mathew <rmathew@santanderconsumerusa.com>, Hortensia Perez

<hperez@santanderconsumerusa.com>, Sabrina Boyd

<SBOYD@santanderconsumerusa.com>

Subject: FW: Investigation Template

Date: Mon, 16 Nov 2015 21:50:44 +0000

Importance: Normal

Attachments: Investigation Template.docx

Hello Everyone,

Attached is the finalized checklist Reena/Tina put together ©

It has received final approval, so you can begin using it. .Also, we will have an open forum to further discuss in our Quarterly meeting (December 4).

Thanks

Yessica Adriano, SPHR, SHRM-SCP

Santander Consumer USA Inc. Manager Human Resources

PHONE 214.722.5667 MOBILE 214.215.5258

EMAIL <u>yadriano@santanderconsumerusa.com</u>
WEB <u>www.santanderconsumerusa.com</u>

From: Yessica Adriano

Sent: Monday, November 16, 2015 1:37 PM

To: Angelina Hullum; Jonathan Morse; Kayla Liggett

Cc: Stephanie Elad; Jessica Gleason **Subject:** Investigation Template

Good Morning Team,

Attached is the final investigation checklist, please have your team begin using this immediately. This will also be a point of discussion for our December 4th meeting, where we will gather feedback from the group.

Let me know if you have any questions.

Thanks

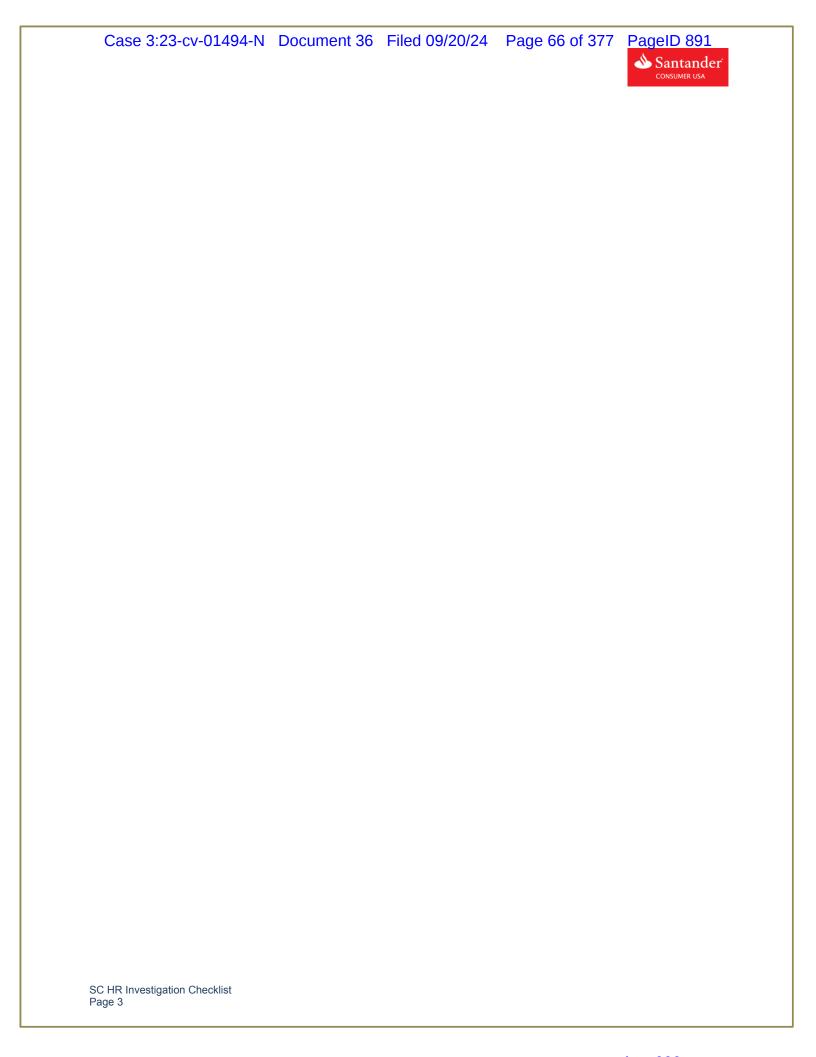


HR Investigation Checklist

Na	me: Associate ID No:
Ро	sition: Location:
Ca	se No: Date Received:
Pre	e-Investigation Process:
	Review inquiry/complaint. Determine whether allegation will be investigated by HR or referred to the business for resolution.
	 Note - If based on harassment, race, sex, age, disability or any other protected class/egregious issues, HR will take the lead and resolve the issue alongside the business.
	Develop strategy/plan of action (include relevant facts, HRBP recommendation, decide level of management to inform).
	Discuss incident/plan of action with HR Manager.
	Obtain HR Manager Approval.
	Discuss matter with complainant's Management team and obtain consensus regarding plan of action. (Mention any recent complaints from team/issues with morale during discussion as well).
	Add case to i-Sight. Additionally, check i-Sight to determine if there have been any previous issues with Employee or Accused. (Review previous Investigation notes/files if necessary).
ln۱	vestigation:
	Notify appropriate department leader of investigation via email or phone. Email should include the parties involved and a high level overview of the complaint. Date completed:
	Identify witnesses and arrange interviews – note date and time on interview notes.
	 Remind Associate of the importance of confidentiality. Determine if investigation has legitimate and substantial business justification that warrants a signed confidentiality agreement.
	When interviewing Associates and Witnesses, ensure your questions enable you to find out the who, what, when, where, how, and why (if applicable) to make sure we have the full story. Only have a witness present in critical situations, such as circumstances dealing with harassment, discrimination, violence, or severe actions that lead to immediate termination. If a witness is deemed necessary, then inform the Associate you both will be taking notes. An Associate may provide a first-hand knowledge statement in a situation that includes a long timeline of events.

SC HR Investigation Checklist Page 1

	Remind Associates of our policy related to harassment and discrimination (ask them to refer to our Associate Handbook via SCUSA Source for additional information).
	Advise that SCUSA prohibits any form of retaliation for making a complaint or participating in an investigation. Encourage Associates to contact their chain of command or HR if they believe they have been retaliated against for participating in the investigation. Also, explain that you may contact them again, if further information is needed.
	Confirm information provided by Associates during interview to ensure your notes are accurate. Date confirmed:
	Obtain any documents, signed statements, photographs, tapes, text messages, emails or other material necessary to evaluate the allegation or information provided by Employees.
	Draft written investigation report. Date completed:
	Discuss proposed findings, conclusions, and recommendations with Manager. Ensure recommendations follow matrix and previous incidents as much as possible to ensure consistency.
	Add report, notes, emails and any other relevant information to i-Sight.
	Follow up and close out the case with the Complainant and the Accused Employee(s). Complainant should be advised that the issue has been fully investigated and appropriate action will be taken to address the issue. Action taken/discipline administered should not be shared with the Complainant. If they have any other issues or feel that they have been retaliated against, they should contact the appropriate parties immediately.
	Advise Department Leader of outcome and recommended action.
Po	st-Investigation:
	Execute recommendation as approved by the HR Manager and agreed upon by management.
	Administer appropriate level of DA (If applicable).
	Enter DA in WorkdayScan DA in Optika
	Record DA/action taken in i-Sight, ensure all relevant information has been included and then close out the case in i-Sight.
	Follow up discussion with leadership pertaining to future prevention of similar issues or address leadership style concerns if applicable.
	Follow up discussion with involved parties (Complainant and/or Accused) to ensure resolution has been sustained.
SC Pag	HR Investigation Checklist ge 2



Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 67 of 377 PageID 892

From: Angelina Hullum <AHULLUM@santanderconsumerusa.com>

To: Stephanie Elad < selad@santanderconsumerusa.com >

Cc: Yessica Adriano < YADRIANO@santanderconsumerusa.com>

Subject: RE: Loss Recovery Team - LEW Date: Tue, 24 Nov 2015 21:46:11 +0000

Importance: Normal

The most recent event was with Cheri Cotton and Deirdre Crouch back in Sept/Oct. There was some confusion on Deirdre's attendance. She didn't feel that she was being treated fairly by Cheri and Tara and had reached out to Jodi. There were too many hands in this situation, with the confusion as to who was handling what/based on location/departments. Jodi, Misty and I were on one page, and Reena and Tara were on another page. In the end, I believe Tara ended up making her own decision and placing the Associate on the DA, which I thought was a Final

From: Stephanie Elad

Sent: Monday, November 23, 2015 12:34 PM

To: Angelina Hullum **Cc:** Yessica Adriano

Subject: Loss Recovery Team - LEW

Hi – can you send Yessica and me a recap of some of the issues you've had with this group at LEW?

Stephanie Elad, SPHR

Santander Consumer USA Inc. Director, Human Resources

PHONE 214.237.3713 MOBILE 214.695.1278

EMAIL <u>selad@santanderconsumerusa.com</u>
WEB www.santanderconsumerusa.com

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 68 of 377 PageID 893

From: "Reena Mathew" <rmathew@santanderconsumerusa.com>

To: "Yessica Adriano" < YADRIANO@santanderconsumerusa.com>, "Reena Mathew"

<rmathew@santanderconsumerusa.com>

Subject: Conversation with Yessica Adriano **Date:** Tue, 24 Nov 2015 21:40:37 +0000

Importance: Normal

Reena Mathew [10:02 AM]:

Hi Yessica, let me know if that term template looks better:)

Reena Mathew [11:19 AM]:

Hi Yessica, btw, I have a Dr's appt at 1 so will probably leave around 12:30p (during my lunch). I'll probably be a little more than an hour though.

Reena Mathew [11:57 AM]:

Did you need both term pw and template? Just making sure :)

Yessica Adriano [12:21 PM]:

what is vicky's name in IM trying to call her and cant find her

Reena Mathew [12:21 PM]:

Vikey Barker Couch

Vickey

Sorry

Vickie LOL

OMG!

Yessica Adriano [12:22 PM]:

got it thanks

Reena Mathew [12:23 PM]:

np!

Btw, ugh, we just received 5 Compliance emails.....do you think the team can split those up? Each one takes some time to complete:(

Yessica Adriano [12:29 PM]:

i think ten was bombarded with these as well, but check to see where she stands, i know sabrina has a big load she was here early and stayed late yesterday trying to catch up, and i need to launch the deidra investigation the herman/ricci situation as well

what else do you have going on

Reena Mathew [12:38 PM]:

Maybe we can discuss when you have some time. It's been really overwhelming: (I'm going to go to my Dr's appt....be back in a little

Reena Mathew [3:19 PM]:

Yessica, For the Compliance/NPPI emails, if the associate isn't working at this location (ie remote, Credit Card associate), would it be ok to send them an email confirming that the information was thier own and not the company's? Typically we're supposed to meet with them face to face......

Yessica Adriano [3:28 PM]:

I had one of those, you need to call them over the phone to discuss the incident and then log it for complianc Reena Mathew [3:28 PM]:

Ok....

ty

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 69 of 377 PageID 894

From: Stephanie Elad <selad@santanderconsumerusa.com>

To: Michelle Whatley <mwhatley@santanderconsumerusa.com>

Cc: Dana Hawkins dhawkins@santanderconsumerusa.com, Pamela Blackburn

<pblackburn@santanderconsumerusa.com>, Yessica Adriano

<YADRIANO@santanderconsumerusa.com>

Subject: RE:

Date: Tue, 24 Nov 2015 21:16:49 +0000

Importance: Normal

Quick update – Yessica spoke with Deirdre in detail about her concerns. There were several allegations brought forward, most of which we should be able to substantiate one way or the other. I asked Yessica to handle this investigation personally, rather than Reena. As it turns out, Reena spoke with this Associate and her AVP a few months ago. I think a lot was missed during that conversation, on Reena's part.

Yessica asked Deirdre if she would like to come back either in a different role at LEW or in a similar role at NRH. She said she would think about it, but Yessica doesn't think it's likely that she will accept. She has apparently been consulting with an attorney.

We are having significant issues with Reena. I sent Pam an email earlier today. Long story short - I think it's time to consider severance. She is overwhelmed with the workload (which isn't any higher than the rest of my team) and making a lot of mistakes.

From: Michelle Whatley

Sent: Monday, November 23, 2015 9:50 AM

To: Stephanie Elad

Cc: Dana Hawkins; Pamela Blackburn

Subject:

The attached resignation was escalated to Legal and Compliance. Please have someone look into validity please and advise if this issue has/was raised with HR at any point.

Thanks mw

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 70 of 377 PageID 895

From: Stephanie Elad <selad@santanderconsumerusa.com>

To: Pamela Blackburn <pblackburn@santanderconsumerusa.com>

Cc: Jessica Gleason < jgleason@santanderconsumerusa.com>

Subject: Reena Mathew - Confidential

Date: Tue, 24 Nov 2015 18:16:41 +0000

Importance: Normal

Pam – Reena is the BP at LEW. She's been with us almost 5 years (DOH Jan 2011). There have been some performance concerns for awhile now – mostly stemming from an inability to handle the workload, and questionable judgment. Angelina had several coaching conversations with Reena before we transitioned Yessica to LEW and Yessica has had even more conversations since she took over a few months ago. Yessica is having to handle a lot of the investigations at LEW because Reena can't seem to get things done and when she does handle some of the issues, mistakes and missteps are being made. There is a significant time management issue, which is impacting the Generalist at the site, in addition to Yessica.

Unfortunately, the situation is not improving and has become worse. We had an incident this week that led to a risk event. The risk event had to do with a term that was not processed. However, upon digging further, this Associate issue escalated partially due to Reena not handling the concerns effectively a few months back. I have advised Yessica to issue a DA to Reena for her mishandling of this incident, as well as some of the other issues that have occurred recently. And, Reena will be receiving a review rating that indicates that she is not meeting expectations. Reena submitted her self review to reflect her view that she exceeded expectations and Yessica will be having a conversation with Reena to help her understand where her performance is really at on Monday.

Historically, we have offered severance packages to HR Associates when we determine it is time for them to leave the business. So, I'd like to start that dialogue with you ASAP. A few weeks ago, Reena shared with Yessica that she's pregnant, which may make this a bit more complex.

We can discuss next week, but I just wanted to let you know ASAP. Yessica and I had a long discussion about this today and I now have clarity that this is the direction we need to go. It's been a long time coming.

Stephanie Elad, SPHR

Santander Consumer USA Inc. Director, Human Resources

PHONE 214.237.3713 MOBILE 214.695.1278

EMAIL <u>selad@santanderconsumerusa.com</u>
WEB <u>www.santanderconsumerusa.com</u>

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 71 of 377 PageID 896

From: Yessica Adriano < YADRIANO@santanderconsumerusa.com> **To:** Angelina Hullum < AHULLUM@santanderconsumerusa.com>

Subject: FW: Reena: Workload

Date: Tue, 24 Nov 2015 21:37:32 +0000

Importance: Normal

Hi Lina- May you please send me any documentation you have (noted conversations, examples, events, situations) want to have an all-inclusive timeline.

Thank you

From: Stephanie Elad

Sent: Tuesday, November 24, 2015 3:19 PM

To: Yessica Adriano **Cc:** Angelina Hullum

Subject: RE: Reena: Workload

I can't imagine that the compliance emails take that long. I would ask Kristen how long they take on average. When I had to do it, it was a 5 minute conversation and a few emails. But, maybe I'm missing something.

From: Yessica Adriano

Sent: Tuesday, November 24, 2015 1:21 PM

To: Stephanie Elad
Cc: Angelina Hullum
Subject: Reena: Workload

Hello Stephanie,

Wanted to bring this to you as an FYI....

Reena approached me a couple hours ago asking if she could leave at 12:30 stating she has a Dr. Appointment at 1 pm, and would need to take a longer lunch. I advised her as previously discussed, I needed more than a same day notification, so we can plan appropriately. She responded with sorry and she understood (exactly what she said last time). She stated she would return to work after her appointment ended.

I received this IM from her below. Ten, Sabrina and myself have all been continuously assisting with her with work and when I ask where she spends her time, she does not have a solid justification.

I will work on a formalized timeline of events and discussions that I have had with her since September and will ask Lina for documentation prior to that.

Reena Mathew 12:24 PM

Btw, ugh, we just received 5 Compliance emails.....do you think the team can split those up? Each one takes some time to complete

Yessica Adriano 12:29 PM

i think ten was bombarded with these as well, but check to see where she stands, i know sabrina has a big load she was here early and stayed late yesterday trying to catch up, and i need to launch the deidra investigation the herman/ricci situation as well

what else do you have going on

Reena Mathew 12:38 PM

Maybe we Can discuss when you have sometime fits been ready 80/2012/4ming 1999 of 3770 my of 3770 m

Yessica Adriano, SPHR, SHRM-SCP

Santander Consumer USA Inc. Manager Human Resources

PHONE 214.722.5667 MOBILE 214.215.5258

 EMAIL
 yadriano@santanderconsumerusa.com

 WEB
 www.santanderconsumerusa.com

Santander Consumer USA Inc. Performance Improvement Plan (PIP)

SECTION I: ASSOCIATE INFORMATION

Associate Name: Reena Mathew

Associate ID: 013696

Associate Job Title/Department/Location: HR Business Partner/Advocacy/Lewisville

Hire Date: 01/31/2011 Time in Position: 4 years

Manager/Supervisor Name and Title: Yessica Adriano/Manager of Human Resources

Department Director/VP Name and Title: Stephanie Elad/Pamela Blackburn EVP Human Resources

Performance improvement period: 30 days

Begin Date: 12/01/2015

End Date: 12/31/2015

(Active period of this notice will affect bonus, transfer and promotion opportunity for the entire duration of the

listed days)

As an associate of SCUSA, we expect performance to be in line with the standards outlined in the job description as well as those of your management team. The goal of this PIP is to align delivered performance to expected performance and assist in making you a successful member of the team.

You are expected to perform to the standards listed in the Performance Standards column in the attached Performance Worksheet. You will find in the Actual Performance Column that you have patterns of sub-standard performance when compared to the standards listed.

As SCUSA provides the resources required to meet the standards, we expect immediate and sustained improvement. Your work will be monitored for compliance with the performance standards on the attached Performance Worksheet. If you do not meet and maintain performance to the standards in the attached Performance Worksheet, you may receive the next level of discipline which, in this case, could range from formal disciplinary action, up to and including Termination. This will occur upon any further occurrence of your performance that does not meet the standards in the Performance Worksheet (see below)

If you have any questions about the terms of your Performance Improvement Plan, please consult with your direct manager or your designated Human Resource representative.

SECTION II: PERFORMANCE STANDARDS AND ASSESSMENT

This section should clearly outline the performance standards that need to be achieved as a minimum acceptable performance standard. The strategies, actions or tasks to achieve the performance standards should be specific, measurable and achievable. These are to be reviewed and monitored during the review period.

Performance Standards	Actual Performance Delivered	Strategies / Actions / Tasks
(What needs to be achieved, as set in job description)	(What has been occurring, Facts)	(Steps to achieve desired performance standards)
Integrates Company Values into all activitiesin order to meet demands of the business, it is expected that all Associates be punctual and adhere to scheduled work hours.	Reena continually asks to leave early and struggles to adhere to her work schedule. In many instances, she only provides a same day notice. (See Addendum for specifics)	It is important Reena adhere to working a full day in adherence to her schedule. When possible, she needs to provide ample notice and maintain these leave requests at a minimum.
Seamlessly executes a full range of duties aligned to deploy HR strategy and objectives into client group. Demonstrated ability to work under pressure, appropriately prioritize and organize work effectively.	Reena has had difficulty completing objectives on a timely basis. When projects/tasks arise, she relies on the assistance of other people for completion. Examples include: DA administration, monthly side by sides, WD maintenance, and the investigation matrix. (See Addendum for specifics)	Reena needs to organize and prioritize her tasks efficiently. It is necessary for her to improve her time management skills by minimizing her social interactions to allow her to focus on her tasks and their timely completion. When requesting assistance from others, she needs to be able to effectively quantify where her time is being spent.
Proactively minimizes legal risk by ensuring client's compliance with company policies and procedures. Makes recommendations, provide solutions, and resolve issues as challenges.	As an HR consultant to the business, it is necessary to be able to make fair and sound judgments when conducting investigations. Reena underestimated a concern brought forth from an employee, did not follow through, and when notified of her decision delayed appropriate actions including processing the termination- which led to a risk event. In addition, in a couple situations she did not secure the objectivity of the room when questioning associates.	It is important Reena follow established policies and be thorough with ever situation/concern brought forth. Our objectivity and ability to effectively diagnose situations is crucial in this role.

SECTION III: ASSOCIATE COMMENTS

Accodiate			
Associate Comments			

Your signature below represents that we have communicated our concerns and that you understand what will happen if the aforementioned standard(s) are not corrected.

Associate Name		Signature		Date	
Manager Name	Macsiac Md. in	Signature	1 Cech	Date	pldas
	yesorca Acinan)	Mullelle		13/11/200

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 76 of 377 PageID 901

From: Stephanie Elad <selad@santanderconsumerusa.com>

To: Pamela Blackburn <pblackburn@santanderconsumerusa.com>

Subject: Reena Mathew

Date: Tue, 01 Dec 2015 23:58:38 +0000

Importance: Normal

Yessica delivered a PIP today to Reena. She didn't take it well. I'll fill you in on Thursday.

Stephanie Elad, SPHR

Santander Consumer USA Inc. Director, Human Resources

PHONE 214.237.3713 MOBILE 214.695.1278

EMAIL <u>selad@santanderconsumerusa.com</u>
WEB <u>www.santanderconsumerusa.com</u>

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 77 of 377 PageID 902

From: "Reena Mathew" <rmathew@santanderconsumerusa.com>

To: Stephanie Elad <selad@santanderconsumerusa.com>

Subject: Meeting

Date: Wed, 02 Dec 2015 01:21:28 +0000

Importance: Normal

Hi Stephanie,

Hope you are well. I just finished meeting with Yessica this afternoon regarding my review and was informed I was being placed on a PIP.

I'm very upset and am in tears. I don't know if you know, but I'm 14 weeks pregnant and am under a lot of stress now after receiving that news.

Stephanie, I've been with the company for 5 years, have gotten along great with peers/my managers, have received positive reviews and have never had any type of formal coaching or discussion about negative performance issues from any one of my managers, not once.

I was completely shocked and upset and working in HR I know that an associate shouldn't be surprised let alone have first time discussions about issues during a review.

I would like to speak to you when you are available. I'm off tomorrow but will be back Thursday. I also do not agree with the point listed especially the one about attendance as it said 'many' (leaving early) and I would like to how that differs from anyone else. I've only asked a few times all together.

I work just as hard as anyone on our team, am a productive member especially with the workload given (supporting LEW and CC) and think I do a decent job. I make mistakes just like everyone else but also want to be successful at the same time.

Please let me know what time is good for you and I thank you in advance.

Reena

Sent from my iPhone

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 78 of 377 PageID 903

From: Michelle Whatley <mwhatley@santanderconsumerusa.com>
To: Pamela Blackburn <pblackburn@santanderconsumerusa.com>

Subject: FW: Hello

Date: Tue, 08 Dec 2015 23:43:35 +0000

Importance: Normal

----Original Message-----From: Reena Mathew

Sent: Thursday, December 03, 2015 7:21 PM

To: Michelle Whatley

Subject: Hello

Hi Michelle,

I hope you are doing well.

I'm doing ok but wanted to see if you had some time to discuss an issue.

I would like for it to be confidential if that's ok and get your thoughts.

I've already followed the chain of command (Yessica/Stephanie) but still don't agree with what's taken place.

I appreciate your time and please say hello to the family.

Thanks, Reena

Sent from my iPhone

Don Uloth

From: Reena Mathew <rmathew@santanderconsumerusa.com>

Sent: Monday, December 7, 2015 10:25 AM

To: reenasara@hotmail.com

Subject: FW: Herman

From: Christopher Mays

Sent: Monday, December 07, 2015 10:05 AM

To: Reena Mathew **Subject:** RE: Herman

Hi Reena,

This is good to hear because last week at our team meeting he seemed fine.

I have never worked on a PIP without the proper documentation but not sure if there is a case where this has happened with someone else. It's just like any other disciplinary action you need documentation to validate the PIP.

Thanks, Chris

From: Reena Mathew

Sent: Monday, December 07, 2015 9:29 AM

To: Christopher Mays **Subject:** RE: Herman

Hi Chris,

MR had met with him and I believe that everything is good now (for now) ©.

Just out of curiosity, have we ever put anyone on a PIP without clear cut/written documentation, for example, say the Manager said they coached the associate but there are no notes/dates etc.?

Thanks, Reena

From: Christopher Mays

Sent: Wednesday, December 02, 2015 12:43 PM

To: Reena Mathew **Subject:** RE: Herman

Hi Reena.

Any update on this?

From: Reena Mathew

Sent: Monday, November 23, 2015 10:56 AM

To: Christopher Mays **Subject:** FW: Herman

Hi Chris!

We have an associate in Ops Training who seems to be having some issues re: being managed and wanted to know if this is something your group could assist with before it escalates to a PIP or something of that sort.

Also, can you tell me who supports Ops Training? Wasn't sure if it was your or Sarah ©

Thanks! Reena

From: Michelle Ricci

Sent: Monday, November 23, 2015 9:33 AM

To: Reena Mathew
Cc: Yessica Adriano
Subject: RE: Herman

Good morning,

They began a few months ago and seem to be increasing each month. It appears he does not like to be managed. When we hired him, my only concern was it appeared he had more turnover on his jobs than one would like to see. I am seeing why now... ③

We were supposed to sit down and talk this afternoon with Courtney/Joe and myself, but he emailed me letting me know he was not comfortable doing so. I asked him to help me understand why, as that is key to moving forward with their relationship. He has yet to reply.

I could certainly reach out to TD, though his actual work (training) is on par. Does Chris or Sarah oversee Ops Training?

Thanks!

Michelle Ricci

Santander Consumer USA Inc.

VP Training

PHONE 214.261.1440
MOBILE 704.707.5005

EMAIL mricci@santanderconsumerusa.com
WEB www.santanderconsumerusa.com

From: Reena Mathew

Sent: Tuesday, November 17, 2015 3:25 PM

To: Michelle Ricci Cc: Yessica Adriano Subject: RE: Herman HI Michelle,

Thank you for looping us in.

Curious to see what all he brings up in the meeting......have these issues been ongoing or did they begin in July?

Wondering if it would be beneficial to involve Performance Development as well.

Thanks, Reena

From: Michelle Ricci

Sent: Tuesday, November 17, 2015 2:06 PM

To: Reena Mathew Subject: FW: Herman

Reena,

We have been having some performance and attitude concerns with Bernard Mullins, product trainer. Courtney made a few notes that you will see attached and I spoke with him on Friday as well. He struggles with accepting responsibility for actions. I have a meeting set up for next Monday with Courtney and Herman; just wanted to make sure that HR was aware as he did express his dissatisfaction with both Courtney and Joe.

Please let me know if you have any questions.

Thanks,

Michelle Ricci

Santander Consumer USA Inc.

VP Training

PHONE 214.261.1440 MOBILE 704.707.5005

EMAIL <u>mricci@santanderconsumerusa.com</u>
WEB <u>www.santanderconsumerusa.com</u>

From: Joe Whitfield

Sent: Tuesday, November 17, 2015 11:22 AM

To: Michelle Ricci Cc: Courtney Valentine Subject: Herman

Morning Ricci!

This e-mail is covered by the Electronic Communications Privacy Act, 18 U.S.C. Sections 2510-2521. The information contained in this e-mail is confidential and intended only for use of the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible to

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 82 of 377 PageID 907

deliver it to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this message in error or there are any problems please notify the originator immediately.

The unauthorized use, disclosure, copying or alteration of this message is strictly forbidden. This mail and any attachments have been scanned for viruses prior to leaving sender's company network. Neither the sender nor the sender's company will be liable for direct, special, indirect or consequential damages arising from alteration of the contents of this message by a third party or as a result of any virus being passed on.

Sender's company accepts no liability for the content of this email or its attachments, or for the consequences of any actions taken on the basis of the information provided, unless that information is subsequently confirmed in writing.

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 83 of 377 PageID 908

From: "Pamela Blackburn" </O=D6ORG/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=PAMELA BLACKBURNDB5>

To: "Reena Mathew" <rmathew@santanderconsumerusa.com>

Subject: RE: Hello

Date: Thu, 10 Dec 2015 15:37:51 +0000

Importance: Normal

Hi Reena,

Many thanks for your email. Michelle is out at Board meetings this week, but I have asked the team to provide me with background documents on the recent discussions with you and will then be happy to discuss further. I anticipate I will have everything by the end of this week, so will be in touch during the course of next week.

Kind regards,

Pam

Pam Blackburn

Santander Consumer USA Inc.

Executive Vice President Human Resources

PHONE: +1 (214) 838-5070 MOBILE: +1 (214) 478-6315

EMAIL: pblackburn@santanderconsumerusa.com
web: www.santanderconsumerusa.com

From: Reena Mathew

Sent: Monday, December 07, 2015 10:51 AM

To: Pamela Blackburn

Subject: Hello Importance: High

HI Pam,

I hope you're well.

I sent MW an email and I'm sure she is busy but I was wondering if I could speak to someone in upper management about how my review was handled. I've already followed the chain of command and spoken to Yessica and Stephanie but I'm still not clear about the situation.

I appreciate it in advance and thank you for your time.

Thanks, Reena

Reena Mathew, PHR

Santander Consumer USA Inc. HR Business Partner

PHONE 214.292.2772

MOBILE 214.364.9136

FAX 214.630.0828

EMAIL MARCH SIZATION OF LANGUAGE PAGE 84 of 377 PageID 909

WEB www.santanderconsumerusa.com

BENEFITS HOTLINE 214.540.2010

Don Uloth

From: Reena Mathew <rmathew@santanderconsumerusa.com>

Sent: Wednesday, December 9, 2015 8:19 PM

To: reenasara@hotmail.com

Subject: FW: Thank You

From: Reena Mathew

Sent: Wednesday, December 09, 2015 7:49 PM

To: Stephen Shaffer Subject: Thank You

Hi Stephen,

Thank you for speaking with me.

Again, I just want to be treated fairly and in the five years here (including this year) , I've never had any type of performance issues up until now.

If these are areas of opportunity that I need to work on, I can accept that but I don't accept them being brought to my attention as areas of concern for the first time during my review, let alone being placed on a PIP.

As a practice here at SC, I have not come across associates being placed on a PIP without clear documentation where the associate was aware of the issues (emails, recaps of conversations, outline of plan etc).

I'm not stating I'm above reproach, but I would like for those expectations to be clearly stated if they're truly an issue and have an opportunity to correct them. Additionally, I have been provided with no dates, documentation or addendum with specifics (as stated on the PIP document) to substantiate any of the items listed.

I am a hard worker and want to be successful as we all do. To be so blindsided and possibly have my bonus, merit and job jeopardized so frivolously is something I cannot accept.

I hope you can understand where I'm coming from and know that I want to do well here at SC as I have in the last 5 years and continue to do so.

Thank you for your time.

Reena

Reena Mathew, PHR

Santander Consumer USA Inc. HR Business Partner

PHONE 214.292.2772 MOBILE 214.364.9136 FAX 214.630.0828

EMAIL rmathew@santanderconsumerusa.com

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 86 of 377 PageID 911

WEB <u>www.santanderconsumerusa.com</u>

BENEFITS HOTLINE 214.540.2010

This e-mail is covered by the Electronic Communications Privacy Act, 18 U.S.C. Sections 2510-2521. The information contained in this e-mail is confidential and intended only for use of the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this message in error or there are any problems please notify the originator immediately.

The unauthorized use, disclosure, copying or alteration of this message is strictly forbidden. This mail and any attachments have been scanned for viruses prior to leaving sender's company network. Neither the sender nor the sender's company will be liable for direct, special, indirect or consequential damages arising from alteration of the contents of this message by a third party or as a result of any virus being passed on.

Sender's company accepts no liability for the content of this email or its attachments, or for the consequences of any actions taken on the basis of the information provided, unless that information is subsequently confirmed in writing.

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 87 of 377 PageID 912

From: "Reena Mathew" <rmathew@santanderconsumerusa.com>

To: "Pamela Blackburn" <pblackburn@santanderconsumerusa.com>

Cc: "Stephen Shaffer" <sshaffer@santanderconsumerusa.com>

Subject: Fwd: Thank You

Date: Fri, 11 Dec 2015 13:34:56 +0000

Importance: Normal

Hi Pam,

I also wanted to mention that I had reached out to our VP Steve Shaffer and he called and we spoke on Wednesday. Please see the email below for additional details from our conversation.

Pam, I am also pregnant (15 weeks) and cannot help but wonder if this has any bearing on my review because I mentioned it to my mgmt when I was 8 weeks pregnant out of courtesy and a month later I'm on a PIP after never being formally coached in my 5 year career. I've been told that I've been coached (after stating I hadn't been) and have asked for documentation numerous times to no avail. One of the items I was told is that I received complaints from my Business Partners when in fact if you look at my past reviews including my mid year, it states I have great relationships. I even received numerous YEI points over the course of the year (from the same people who allegedly complained). When I mentioned that to my mgmt they stated they only gave me those points after complaining and I then followed up (which again is not true). These are just a few examples of what I was told and there is nothing to substantiate the claim when I request it.

I just want to give you additional background information in case you weren't aware. To be candid, this whole situation has given me a lot of undue stress and I just want to be treated fairly especially because of the negative impact this would have on me.

Thanks again for your time and let me know if you need anything else.

-Reena

Sent from my iPhone

Begin forwarded message:

From: Reena Mathew < rmathew@santanderconsumerusa.com >

Date: December 9, 2015 at 7:48:40 PM CST

To: Stephen Shaffer < <u>sshaffer@santanderconsumerusa.com</u>>

Subject: Thank You

Hi Stephen,

Thank you for speaking with me.

Again, I just want to be treated fairly and in the five years here (including this year), I've never had any type of performance issues up until now.

If these are areas of opportunity that I need to work on, I can accept that but I don't accept them being brought to my attention as areas of concern for the first time during my review, let alone being placed on a PIP.

As a practice field as control of the issues (emails, recaps of conversations, outline of plan etc).

I'm not stating I'm above reproach, but I would like for those expectations to be clearly stated if they're truly an issue and have an opportunity to correct them. Additionally, I have been provided with no dates, documentation or addendum with specifics (as stated on the PIP document) to substantiate any of the items listed.

I am a hard worker and want to be successful as we all do. To be so blindsided and possibly have my bonus, merit and job jeopardized so frivolously is something I cannot accept.

I hope you can understand where I'm coming from and know that I want to do well here at SC as I have in the last 5 years and continue to do so.

Thank you for your time.

Reena

Reena Mathew, PHR

Santander Consumer USA Inc. HR Business Partner

PHONE 214.292.2772

MOBILE 214.364.9136

FAX 214.630.0828

EMAIL <u>rmathew@santanderconsumerusa.co</u>m

WEB <u>www.santanderconsumerusa.com</u>

BENEFITS HOTLINE 214.540.2010

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 89 of 377 PageID 914

From: Pamela Blackburn <pblackburn@santanderconsumerusa.com>

To: Stephen Shaffer <sshaffer@santanderconsumerusa.com>

Subject: Re: Reena Mathew

Date: Mon, 14 Dec 2015 03:01:24 +0000

Importance: Normal

Thanks Steve. Have you had an opportunity to interview Yessica and Angelina on this yet, to gain their perspectives and evidence as her leaders?

If not, could you do that this week so you have a full picture?

Many thanks

Pam

Sent from my iPhone

On Dec 13, 2015, at 8:51 PM, Stephen Shaffer < sshaffer@santanderconsumerusa.com > wrote:

My notes from my conversation with Reena. Sorry, I thought I sent these already.

Conversation with Reena Mathew. Date: 12/9/15 Time: 6:06pm Phone number: 214-364-9136 - I called her as agreed.

Reena started by explaining that Angelica was her manager for most of 2015. Yessica had become her manager in October of 2015.

-She felt blindsided by her review and how it was presented.

- -She noted that turnover is high on their team, and that everyone is anxious about if they will be the next to go
- -2015 goals were set with Stephanie (overall team). Her mid-year review was fine.
- -End of year review, once management knew she was pregnant was not good. Reena indicated that she received no coaching, no feedback, and received no follow-up mail.
- -Her self-rating was meets/exceeds. She was placed on a PIP. This has never happened in her career.
- -Again she reinforced that there was no coaching and no documentation
- -She was told the issues were her attendance, completing projects and asking for help (took this to mean not asking for help when stated)
- -She noted that in her view the HR team preaches documentation and there is none for her. The PIP form specifically asks for an addendum and there is not one on her PIP. She states that she has requested documentation and addendum and has received neither to this day.
- -Stated that she can accept that she has areas to work on, but someone should tell her and give her a chance to fix. There is no clear cut information and this was done frivoulously.
- -Asked her if I talked to Angelica and Yessica if they would agree that they did not coach her? She indicated she did not know what they would say.
- -This is unfair to the associate
- -Conversation with Stephanie did not take place until after the PIP
- -Told Stephanie she did not agree with the points, and there never was a serious sit-down.
- -Stephanie indicated that both Angelica and Yessica said they did, so when two people say it, there must be truth to it
- -She then indicated if coaching took place where is the documentation?
- -Reena then stated. Even if meetings were shown to be held on a calendar, that does not mean the associate got a clear message about performance

- Asked if the coaceans explained were called the coaled the coale
- -Referring continual referral of the "the associate", I asked her if she did not have more knowledge and understanding than the normal associate, thus should she not have been able to decipher the situation sooner and make progress? No clear feedback, so unaware. When issues were brought up with her and Sabrina such as leaving early and she was coached, it has not happened again.
- -She was told by Stephanie (after the PIP) that the workload was not bad at LEW, but then she is told she needs to ask for help when it gets heavy, she feels she is getting two different messages here.
- -I asked her what she wants to come out of this escalation. Her response was that she wants to be treated like everyone else. HR should have their "ducks in a row" for a PIP
- -I asked her to be more specific, i.e. what are you wanting to specifically come out of the escalation? I then stated that I was making no promises other than this would be looked into.
- -She wants:
 - -No PIP
 - -Her bonus. She worked her tail off.
 - -Merit
- -she noted when she asked how this would affect her bonus and merit, she received no answer. She actually does not want any of this.
- -I noted at this point that even if changes took place (no promises were again reemphasized) that it did nothing but change the timeline. In other words, her management team's view of her performance is clearly not good and she clearly understands that now. Thus the feedback is clear and has been given. Even if we shifted the process it would only change the time by which she had to improve, and did she understand that? She indicated she understood, but then indicated a 30 day PIP is rough.
- -She encouraged me to look at her file. There is nothing there (according to her) that would indicate this is warranted -She indicated that I should look into the process for a PIP. She clearly feels it was not followed her due to no coaching (her opinion), no documentation provided when requested, no addendum on the PIP form.
- -There is no data and someone's livelihood is being affected here. Around this point she again mentioned she was pregnant. Reena mentioned her pregnancy several times throughout our conversation.
- -She was told there were complaints from clients regarding the handling of DA's. She disagreed indicating that many clients have given her "points" for her work, and that she gets points all the time. Why does she get so much recognition if things are so bad?
- -She encouraged me to talk to her business partners. She also indicated I should look at Kronos regarding dates.
- -She said she wanted to be treated fairly. There is nothing to substantiate what is being said.
- -I indicated we should discuss next steps.
 - -I needed to talk to Stephanie, Yessica and Angelica.
- -She asked that I look at her "You Earned It"
- -I did indicate I would look into the process of a PIP.
- -She again reiterated wth no documentation, how do we know an issue was discussed clearly and accurately or at all?
- -She indicated her disappointment in this process. She wants to move forward. She is pregnant at this time and she really does not need this stress.

I closed the conversation indicating again, no promises but if she felt she forgot to cover something, or if some other information occurred that she wanted me to know or she thought would be helpful that she should feel free to call me or e-mail me.

Stephen Shaffer

Santander Consumer USA Inc. VP Human Resources Business Partnership

PHONE 214.722.4580 MOBILE 469.236.5931 www.santanderconsumerusa.com

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 92 of 377 PageID 917

From: Stephanie Elad < selad@santanderconsumerusa.com>

To: Yessica Adriano < YADRIANO@santanderconsumerusa.com>

Subject: RE: Investigation Material

Date: Tue, 15 Dec 2015 16:01:37 +0000

Importance: Normal

Thanks!

From: Yessica Adriano

Sent: Tuesday, December 15, 2015 8:03 AM

To: Sabrina Boyd; Hortensia Perez; Reena Mathew; Tina Mohan; Fatma Rizvan; Russell Tookes; Brandon Webb; Susan

Haynes; Whitney Andres; Nicole Heinicke; Kristen Lagunes; Melissa Lawson; Jeanette Rodriguez

Cc: Angelina Hullum; Jonathan Morse; Kayla Liggett; Edward Fabritiis; Stephanie Elad

Subject: Investigation Material

Team,

As a follow up to our end of year meeting, attached is all the material used during our investigations which includes:

- Investigation Checklist
- Investigation Notes Template
- Investigation Summary

Remember to partner with your HRM prior to commencing and while handling investigations, please feel free to reach out to any of us if you have any further questions.

Thank you, Your HRM team

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 93 of 377 PageID 918

From: Stephanie Elad < selad@santanderconsumerusa.com >

To: Pamela Blackburn <pblackburn@santanderconsumerusa.com>

Cc: Yessica Adriano < YADRIANO@santanderconsumerusa.com >, Stephen Shaffer

<sshaffer@santanderconsumerusa.com>

Subject: FW: D. Crouch - Investigation Summary- CONFIDENTIAL

Date: Tue, 15 Dec 2015 15:49:03 +0000

Importance: Normal

Attachments: D. Crouch Timeline of Events.docx

Hi Pam — Yessica has completed her investigation in regards to the Deidre Crouch matter. As you probably recall, Deidre submitted her resignation cc'ing MW, Eldridge, etc. I asked Yessica to handle the investigation personally, as it appeared that there were some significant gaps on the part of Reena and Misty (former BP at NRH) in handling this matter.

Yessica's recap is below and her timeline is attached. I agree with her recommendation to administer a final warning to the manager involved (Cheri Cotton) and to have an impactful, coaching conversation with the AVP. However, I anticipate that the business will push back on the final recommendation so I'd like to get your thoughts before we speak with VP Jodie Kelch and SVP Mark Mooney.

We have had issues with the leadership in this group before. I think that there are some opportunities with the VP and SVP, which trickles down to the rest of the team. I have spoken with Wayne about these issues prior but it was awhile ago, probably 6 months.

Please review and advise so that we can provide our recommendation to the business. Thanks!

From: Yessica Adriano

Sent: Tuesday, December 15, 2015 7:34 AM

To: Stephanie Elad

Subject: D. Crouch - Investigation Summary

Hello Stephanie,

Below is an attempt at a general investigation summary for Deidre Crouch, the detailed investigation notes of every conversation I had will soon follow. I have attached a time line of events dating back from when Deidre first raised her issues, which paints a vivid picture of her attempts at reaching out. The timeline below is just of our investigation. Please review and advise if you would like for me to condense or be more specific on the summary below. My recommendation is at the end of this email, I would also like to gather your thoughts on appropriate course of actions. Thank you.

Date Complaint Received: 11/24/2015

Investigator(s): Yessica Adriano- Manager, Human Resources Complainant(s): Deidra Crouch, Collateral Recovery Specialist

Accused: Cherri Cotton – Loss Recovery Manager

Witness(es): Jeannie Palmer, Nadia Robinson, Jessica Gibson, Natassia Kinney, Nathan Jones, Chris Musso – Collateral

Recovery Specialists

Ebony Jones- Reinstatement Coordinator

Tara Stewart- AVP Loss Recovery, Jodie Kelch-VP Loss Recovery

Timeline of Investigation:

11/21/2015: Deidra Crouch's Resignation letter received

11/24/20 19:38 of 23 the polyment of the proments of the polyment of the polym

11/25/2015: Deidre responds via email to me to verify if the position will be under Tara

HR Compliance reviews past logs and does not find a complaint from Deidre

12/1/2015: Advised the position open would still fall under Tara, and asked if she would be willing to go to Late Stage at NRH. Deidre responds same day stating due to her declined health and the treatment she endured she will not return.

12/7/2015: Spoke with 6 agents from Sherri Cotton's team, and 1 agent from a surrounding team

12/8/2015: Met with Tara Stewart, AVP Lost Recovery and Jodie Kelch, VP Loss Recovery

12/9/2015: Met with Cherri Cotton, Loss Recovery Manager

12/11/2015: Nastassia Kinney, comes to see me stating that Cherri has been nicer to the team since the day Jodie arrived and no longer places the customers on speaker phone, however she has begun to "play her like she did Deidre" through EIC comments. Advised will look into EIC and follow up with her the following week.

Deidre Concerns:

- Cherri treats her unfairly and humiliates her anytime she can, which caused a decline in her health and well being
- Employees were aware of her write up before she knew about it
- Brought these issues to Tara several times and she never did anything about it, went to HR, and contacted an Ethics officer
- Cherri is always sharing people's business with other employees and says mean things about everyone (examples provided)
- Cherri always puts upset customer's on speaker and mocks them

Substantiated Claims from witnesses questioned:

- 2 employees state they were aware of Deidre's write up as Cherri left if on her desk and made comments in regards to it
- 2 employees confirm Cherri speaks negatively of many employees and their personal matters, examples and time frames provided
- 2 employees state that they these matters have been brought to Tara's attention several times and to HR and nothing was done but things got worse
- 1 employee confirmed how Deidre was taunted by Cherri after returning from an HR meeting
- 3 employees confirmed it is important not to get on Cherri's bad side, because of how her disposition changes (2 of them provided examples of how bad she has treated Deidre and Jeannie)
- All interviewed parties confirmed Cherri places upset customers on speaker phone, 4 of the 6 interviewed agree she laughs and does this for an entertainment value

Unsubstantiated Claims:

- Deidre notifying the Ethics officer, compliance thoroughly reviewed and confirmed there is no record of this
- Deidre reaching out to Tara on 09/04/2015 to question her Final issued on 08/30/2015

Tara/Jodie Meeting Recap:

- Jodie begins meeting by stating Misty, Reena were asked to get involved and they advised this investigation was closed with no findings
- Tara reviews how the oversight of Deidra's attendance occurred, how she reached out to have it corrected, and her thorough apology to Deidra over this. This error was caught in time and Deidra's bonus was not impacted
- Deidra brought up concerns of favoritism, bullying, log in/log outs, ,eating on the floor concerns to her. Upon her review, Cherri was doing everything correctly and was consistent in her practices
- Tara references Cherri's communication style and how it can be misinterpreted as well as hers
- Tara states the 10/20 meeting went well, she followed up on 10/27, Deidra was fine and she helped bridge the communication between her and Cherri by having her do a recap and receive kudos. The resignation letter came to her as a surprise.

Cherri Meeting เลือน (พ.ศ. 1494) Present years 36 Filed 09/20/24 Page 95 of 377 PageID 920

- Issues with Deidre began after she was written up, Deidre just stopped speaking to her
- Claims she has never spoken negatively about any one on the team. Examples provided and she remembers another associate announcing one of these incidents, but it didn't come from her
- States she is consistent with holding everyone accountable and applies same rules to all
- She has placed customers on speaker phone but only while she is multitasking and helping associates at the same time. If a customer is irate and uses profanity she is quick to pick up the headset. When questioned if she has laughed, she says maybe but not at the customer. Advised many have corroborated she has placed these for an entertainment value, she states she does not know why they would say that
- Claims team environment is good and references issues with Nastassia
- Per Jodie's question, admits she is personable with employees but once a DA is administered has "pulled back" and changed her style

Recommendation:

It is evident that Deidre reached out multiple times using several avenues, these issues were not addressed, nor given the urgency it required.

In speaking with Reena, she did not fully review the emails forwarded to her highlighting Deidre's concerns. During the HR meeting, she included and allowed Deidre to lead the questioning when the day before Deidra mentioned her discomfort with Tara. Reena at one point mentions she feels Deidra exaggerates, and states she did not look into the claims Deidra made (since Tara verified them). The only follow up conducted was from Tara. As an HR member, our diligence in investigation matters is crucial.

In regards to Cherri Cotton, it was substantiated her ill practice of placing customers on the phone with an intent of mocking them. In our meeting with her, she also admits to changing her style and not being as personal as she is used to when an employee is placed on a disciplinary action. For these behaviors to include the substantiated claims and her failure to uphold our leadership expectations as a manager, I am recommending a Final Written Warning.

During my meeting with Tara, my perception is she was quick to defend Cherri and at one point comments her communication style just like Cherri's has been questioned before. The timeline and emails prove Deidre brought up Cherri's concerns and her incorrect coding, the delay in getting this corrected is questionable. However, she did involve HR in the matter and we allowed her to take reigns during the HR meeting, and she handled the follow up with Deidre. My recommendation for her is a strong coaching, emphasizing the objectivity we need to maintain as leaders as well as appropriate timely responses to agent complaints.

Jodie Kelch did follow up immediately with HR upon receiving Deidra's concerns.

Thank you, Yessica

FINAL REPORT FOR HR - REENA MATHEW

Reena Mathew - Human Resources Business Partner. Associate Number 013696

Current Manager: Yessica Adriano. Previous Manager: Angelina Hullum

HRD: Stephanie Elad

Timeline of Events in regard to my investigation:

12/8/15 – Mail sent from me to Reena Mathew indicating I was meeting with members of my extended team, and I would like time with her. Reena responds positively but asks if I am aware she has issues with her review. I reply that I am unaware of these issues. She indicates that she has escalated to Pam Blackburn and Michelle Whatley, but has not heard back as of yet. Inform her I will be glad to talk to her, and that my intent would be to talk to Pam at my one on one that coming Friday if she would be ok with that. She indicated that she was fine with it.

12/9/15 – Brief conversation with Stephanie Elad. Informed Stephanie by phone that I would be meeting Reena. Explained Reena had escalated to me and that I needed to hear what she had to say. Stephanie indicated that both Angelina and Yessica had informed her that they had coached Reena. As to documentation, some rough timelines and notes did exist. She had a conversation with Reena as well. Stephanie's feeling was that Reena had definitely been giving feedback and coaching, that Reena was in denial, and that we were in-line with work we had done with clients in the past.

12/9/15 – Steve and Reena set up time for Steve to call Reena at 6pm that evening. I would call her at 214-364-9136.

Summary of notes and conversation with Reena on 12/9/15. Notes attached.

Reena reported to Angelina most of the year. She then reported to Yessica as of October 2015.

Reena felt blindsided by her review. Her mid-year review was fine.

She indicated that everything changed once management knew she was pregnant.

She received no coaching during the year and she requested documentation and received none.

She never had a conversation with Stephanie until after the Performance Improvement Plan (PIP) was issued.

Believes that when we use a PIP it is a last resort. She should have been given in her opinion a time to correct her behaviors and address issues, but this did not occur.

When asked what she wanted out of the investigation she wanted the following:-No PIP; Her Bonus; and Merit.

Reena was informed that even if changes took place, that she still have a Performance Issue with her managers to work on, and that the timeline would only be delayed.

Reena emphasized her being pregnant and her desire to be treated fairly.

I communicated no promises other than I would look into it, and get back to her.

12/10/15 - Stephanie sends Angelina Timeline (attached)

In reviewing this timeline and what back-up e-mails Angelina provided, it is evident that some discussion went on between Angelina and Reena, however what is not clear is the results of these discussions. In other words, from the dates and aligning e-mails I have no doubt that requests were made, and some level of discussion was held. While an associate of Reena's seniority can be expected to be self-aware enough to know that issues around performance are being raised, the management team could have been clearer in their expectations and potential consequences due to performance issues. In addition, there were times the management team should have followed up or pushed harder on issues.

12/10/15 – Stephanie provides her notes on her discussion with Reena. (Attached)

This conversation took place after the PIP was communicated. Stephanie explained that both Angelina and Yessica had expressed communication on issues regarding attendance and follow-up on items with the business. Reena did express her view that her pregnancy and her being a minority (the first time this has come up in documentation or discussions to my knowledge). Reena stated repeatedly that we were not following our process of coaching to address problems first. Stephanie insisted coaching was provided. Stephanie indicated she too had observed performance gaps. Reena did indicate she had a better feel of the feedback from Stephanie. Stephanie mentions two areas where she provided feedback to Reena, and while valid they are recent and no clear consequences or steps are conveyed.

12/11/15 – Reena sends mail to Pam letting her know that she is pregnant and that she is worried this is playing into decisions made. Also lets Pam know she has reached out to me, and that she has received "you earned it" points for service to clients.

12/14/15 – Reena meets Steve at Lewisville. —Original and main purpose of the meeting is to just have Steve and Reena get to know one another – the original reason for contact. However, a quick discussion on the issues raised happens.

Reena provides a copy of her mid-year review for 2015. Discussion around goals in the Mid-Year. Did Reena meet new managers – yes she has one more manager to go. Keegan.

Anti-bullying task force – Angelina was on point. Angelina set goal aside.

Create "Get in the Know" - what was discussed at offsite meeting

HR Advocacy – constant interaction – trained new HRBP's and Generalist. Dean, Glena, and Misty. We discussed her PIP. Provided two complimentary e-mails. She insisted that she has received no feedback on her goals. I told her I would call her by Monday, December 21, 2015. (I did e-mail her the morning of with a status)

12/14/15 - Steve interviews Yessica Adriano.

Yessica had Reena for three (3) months. They had a one on one most every week. In their first meeting, Yessica communicated to Reena that she was concerned about one real project goal being on there. She felt it left Reena exposed if the project tanked or failed. On 9-28-15, Yessica emphasized the need to maintain a high level of efficiency. Workload was going to continue to grow. She told Reena she needed to help with the "box"; that they all did. Reena feels they are too busy, and she cannot get to the box. Yessica opinion in coming from NRH is that three (3) including her should be able to handle LEW. Yessica ran numbers the support per associate has LEW with slightly more than NRH. However, some work is also going to leave LEW, so the numbers become even closer, not justifying another headcount. There are issues with last minute notifications of doctor's appointments, times where she

leaves early and then says she will work from her phone or home. She has told Reena what she has as far as expectations, but when expectations are not met, Reena has not been told the seriousness and that her job may be at risk. Copy of the PIP provided. Yessica also provides some documentation.

- 1) On 9.28.15 Yessica reviews Reena's goals with her
- 2) On 10/12/15 Disciplinary Actions (DA's) are discussed, but the nature and clarity of the discussion is not clear.
- 3) On 12/1/15 The PIP is presented Yessica's notes indicate it is not well received.
 - a. Pregnancy, stress on pregnancy, workload are mentioned by Reena
 - b. Workload is brought up by Reena as issue. Cannot work after hours with children
 - c. The PIP is crazy and B.S.
 - d. Judgment is discussed. Reena disagrees with issue.
- 4) On 12/9/15 A follow-up meeting is held.
 - a. Reena requests the documentation that exists
 - Main issues discussed are workload, quality of work, and judgment according to the notes
 - c. Leaving early was discussed. Reena indicates others do it as well, and this may be true at times, but as noted by managers, work needs to be completed and client needs addressed.

12/14/15 - Review of the Mid-Year Review document. - Dated 7/8/15

Manager overall evaluation is vague and not specific.

Overall evaluation encourages Reena to push herself to be better. Look for ways to make LEW more efficient, train new managers, and look for trends in the GITK. (Get in the Know)

Goal – Actively drive, support, and enforce risk management standards.

Manager Evaluation – Reena stays on top of all compliance issues and is timely when returning any risk event information back to Compliance.

Goal - Create and share reporting to educate business partners on HR trends

Create Get in the Know spreadsheet

Manager Evaluation – Would like to see Reena pull information in order to become more strategic with her business partners and identify trends. With her tenure and knowledge, she can provide valueable (sic) recommendations to the business leaders.

Goal – Develop processes to develop the skills of our leaders.

Meet with new managers ...and sit in on side by sides, attend jumpstarts during their first 3-6 months... Manager Evaluation – Would like to see more progress in this area. We have many new managers that need training and guideance (sic) Reena needs to spend more time on the floor with all managers. Reena response: Early Stage here in Lewisville just hired four managers and will start initiating side by sides, attending their jumpstarts and even provide quick training if needed in Kronos, WD, etc.

Goal - Create investigation matrix that will be used internally via HR...

Manager Evaluation: This goal is almost complete. Looking forward to the final product.

Goal: Formulate rollout of anti-bullying campaign...

Manager Evaluation – We have made progress, but have a lot more work to do in this area, would like to see more ideas and progress in this area now that we have more HR support.

Reena – produces e-mail from Angelina dated November 10 indicating goal was shut down for the year. When I met with Angelina she confirms.

Section summary - Manager Evaluation.

Reena does a great job with her day to day duties. I would like to see her spend more time training our managers and working on her projects.

Competencies: All Manager Comments: Collaboration – Reena does a good job collaborating with members of our team. I would like to see her branch out to other members of HR advocacy. Interpersonal Savvy. – Reena does an excellent job of building rapport with all levels of employees. She is trusted and always professional. Section Summary – Reena maintains consistancy (sic) when applying policy/procedure. She completes here compliance training as scheduled. She works with Compliance to minimize risk when necessary.

Development: Manager Evaluation – Reena can continue her growth this year by focusing on helping new managers develop and by working on completing her goals and projects. I encourage her to step out of her comfort zone and find ways to take herself to the next level.

Complimentary E-mails:

April 3, 2015 regards Reena's recognition of an employee in distress and connecting him with EAP, potentially preventing a suicide. Angelina and Stephanie compliment her on her efforts.

October 19, 2015 regards a complimentary mail from Yessica recognizing an attendance proposal developed by Reena.

Timeline of Events – identifies several times that conversations were held or issues identified. Unclear if definitive feedback was provided to Reena of where she had to improve and the consequences if she failed.

12.17.15 - Steve interviews Angelina Hullum.

Angelina had Reena for 8 months of the year. When Paula was here, Reena expressed concern about being overwhelmed and stressed. She at one time wanted part time, but was told that there were no p.t. positions in HR. Originally a compromise took place that let her arrive in the office 30 minutes later and supposedly stay later. However this never seemed to work and took place over a year ago. January 14 – Reena missed an e-mail and did not terminate someone until January 22. She was talked about the mistake, so it was noted, but no pattern existed, and I did not interpret it as a serious outcome, but something to improve per the back-up e-mail.

Other instances occurred and the problems were in some cases brought to Reena's attention, and most of the e-mails asked why something was not done or requested that a person receive it. Some items like

a vacation approval and our lack of follow-up on her report from a Dallas HR luncheon reflected our inability to hold her accountable.

PIP Process — I questioned three different HRM level folks. To me the PIP process, i.e. when it becomes effective, what feedback transpires before it, and how long it goes into effect for is unclear. My conclusion from my conversations is that a PIP document was a "last straw" reaction, and the timeframe of 30 days is likely too short of a time to determine if a turnaround is effective, and it needs to be restated that this is exactly what it says it is, a performance improvement plan. It is not a last straw.

Summary:

The Operations HR team has not done a totally effective job in managing Reena Mathew, especially in holding her accountable for her mistakes and poor performance at times. Too often the team was being nice in allowing schedule flexibility which is a good thing if the work is getting done, but all too often DA's were not processed and while it was mentioned, there were no consequences or changes, as a matter of fact there is no evidence of even a mention of consequences. Reena was continually allowed to leave early for last minute Doctor's appointments (ones that would have been known about well in advance) penalizing other team members with work. She continually is worried about the workload compared to others, and leaves it to other team members to manage team collaborative roles like managing the box, yet Reena is told at mid-year she is a collaborative team member. Management is watching Reena's time instead of her goals and her completed workload. For instance, while helping the team with issues in "the box" is brought up, at some point this should have been documented in writing as part of expectations. More SMART (Specific, Measureable, Achievable, Results-oriented, and time bound) objectives are needed. As to Reena's workload, Yessica has listened and run numbers which indicate right now LEW has the resources needed to do the job, especially with upcoming reductions. Reena has indicated that she has children and cannot work after hours. This is not the issue to debate. The role should have clear responsibilities and goals laid out. Reena is responsible for getting that work completed and with quality. How much time she spends completing her work is up to her time management and time allocation, though she is expected to finish the work in allotted and fair time frames. She is an exempt level professional and needs to complete her work, and management's mission is to provide the coaching and tools for her to succeed.

Recommendations:

At the heart of the matter is the intention of a Performance Improvement Plan (PIP). In discussions others on the team, the intention is not as Reena interprets and we need to make this clear. Reena's performance has been lacking and our step at this time will be a PIP with an included action plan for Reena to improve. If she fails to show improvement through the action plan and regular meetings, then her management will move to provide her a documented verbal warning indicating where she is falling short, where she can improve, and the time frame to improve. Part of the action plan will also take into account potential areas where we can assist her in improving, but she must provide input to this process. The performance improvement should run 90 days and have weekly check-ins with monthly reviews.

Recommendations Continued:

Overall, there were good intentions by the management team, and assumptions that Reena would totally understand and buy off that her performance was not up to par considering the different times she was asked or a poor action was pointed out. Documentation of the intended coaching should have started sooner. The performance issues need to be corrected through the PIP/Action Plan process. In addition to structured coaching, feedback, and action planning through the PIP process, it should be recognized that this process will not affect the upcoming bonus and or merit. Reena will receive a "Meets" rating and the appropriate compensation that accompanies this rating. This does not mean that Reena was without performance gaps, rather we are now addressing her performance issues in a plan now and it is too late to affect her rating and compensation. However, this feedback and her performance against her action plan will be taken into account for the mid-year and annual review of 2016.

12.8.15 - Reesa intoms Steve concerns as new, as - intomed she escalated to PB	-concerned a hundly of newers? 12.9.15 - true set to talk by phase at bour Stare to call Record @ 24-364-9136	12.10.15- Stylme and Angelia tuebla 12.11.15 - Styline Seads her swring 12.11.15 - Rever Let Par buous ale tolked to me	12.13.15 - Steves notes to the ty 12.14.15 - not w leave 12.14.15 - not w leave 12.14.15 - not w lessen 12.14.15 - lyselin not	Resolve Hallon 32ml.
12.8.15 - Re 1201.02) - 1001		12.10.15- 12.11.17- to me	12.13.15 12.14.15 12.14.15 12.14.6	20

Reen A Mathew 6:06pm

214-364-9136 Awgelina - old manager. - majored of 2015. 4-551ca - Oct Review - how presented. Feels blindsided Towner is high. with him with an 2015-goals . Stephnie. - documeted neview - Mid poview - Pine Here received negative conchy Headback. Mid year NAS good. End of year - (Pregnet) sevices - gost told her programs. No conchy. / No Pollow-up Mail / No feedback

Anted self - Meets/exceeds - Placed on PIP. Never is caused NO DOCUMENTATION COACHEN ATTENDANCE (completen projects listing for hely Investigation and of Prench documentation - No Adderday on Pit. No INTO to this day Con accept anens to work - give clinice to fix Bes not have clement into mation. Done Convostossy. Will they represent combay? - doesn't know a lot they will say? Ushar to associate - preach. Corversation & Stephene - Atten PIP land consensation. Don't agree with the points. Never had a serious sit down They said they did. - Fronde her documentation. Concerns + Are they unlide - mens of appointments - PiP-swere Inst nesort. Not smy she does not more - smy does Not be lieve at PIP yet.

Not be lieve at PIP yet.

Clause to consuct behaviors - 135 ves brught day review.

Until NSEUSE that it is An men of opportunity. - 1st time

NAIL NSEUSE that it is An men of opportunity. Assurante - don't you have more know headse - quilelives

(Sabaran) NOT AN ISSUE SINCE. Schedule.

(Sabaran) NoT AN ISSUE SINCE. Schedule.

And fluk work lank is bord they dut - she to let to usk for help. Care out - trental librorryone else. Duks in mai fair PIF.

Looken fai: - No promise Burs - would foul off - No knowledge of affect. Poes not chy view of pentomere - only true line chys P.P. 30 dy is pargle - book at file. NOTHING PAUCHISEL. - what is process for & PIP? NO DATA. - SUMMENTS I WE hood. NO documentation Said coplants ADP's. Our points of the they's close. - Points newords - you executed it - sext points - get points , Il time why necognition. Talk to Bisivess Partners. Even with the dates - Look of Knows. Treat fairly NOTHING TO SUBSTANTIATE, NEXT STEAS. - STEPHANIE, Angelina, Tessica. File - look at. Look At You Emmed It. Process for PIP. -what people. Jooly for something - how does that prove associate. As appoint went - Mere Cournel. - Regnest - steers Feel free to tentl on entil - understand. If I weed couly couch ve-

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 106 of 377 PageID 931

From: "Reena Mathew" </O=D6ORG/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=REENA MATHEW0CB>

To: "Yessica Adriano" < YADRIANO@santanderconsumerusa.com>, "Sabrina Boyd"

<SBOYD@santanderconsumerusa.com>

Subject: RE: Holiday Pay

Date: Mon, 28 Dec 2015 22:53:34 +0000

Importance: Normal

NP—Yes we will get it sent over. Today has been..... wow!

From: Yessica Adriano

Sent: Monday, December 28, 2015 4:48 PM

To: Sabrina Boyd Cc: Reena Mathew Subject: Re: Holiday Pay

Thank you!!!!

On Dec 28, 2015, at 4:46 PM, Sabrina Boyd <<u>SBOYD@santanderconsumerusa.com</u>> wrote:

We will get it taken care of!!

Sabrina Boyd

Santander Consumer USA Inc. HR Generalist

PHONE 214.261.1619 MOBILE 469.834.6208

EMAIL <u>sboyd@santanderconsumerusa.com</u>
WEB <u>www.santanderconsumerusa.com</u>

From: Yessica Adriano

Sent: Monday, December 28, 2015 4:18 PM

To: Sabrina Boyd; Reena Mathew

Subject: Fwd: Holiday Pay

Is this humanly possible?

Begin forwarded message:

From: Paula Blayney <pblayney@santanderconsumerusa.com>

Date: December 28, 2015 at 4:15:23 PM CST

To: Whitney Andres < wandres@santanderconsumerusa.com >

Cc: Angelina Hullum <<u>AHULLUM@santanderconsumerusa.com</u>>, Andrea Ashley

<<u>AASHLEY@santanderconsumerusa.com</u>>, Susan Odom <<u>sodom@santanderconsumerusa.com</u>>, Yessica Adriano <<u>YADRIANO@santanderconsumerusa.com</u>>, Reena Mathew <<u>rmathew@santanderconsumerusa.com</u>>, Stephanie

Elad < selad@santanderconsumerusa.com >

Subject: RE: Holiday Pay

Hello~

Tks

Paula Blayney

Santander Consumer USA Inc.

HRIS Manager

Mobile-214-354-6913

From: Whitney Andres

Sent: Monday, December 28, 2015 3:08 PM

To: Paula Blayney

Cc: Angelina Hullum; Andrea Ashley; Susan Odom; Yessica Adriano; Reena Mathew; Stephanie Elad

Subject: RE: Holiday Pay

Thank you Paula- I have reached out to HRBP's & HRG's at Lew & COD and I will be compiling a list to send to payroll.

Thanks again!

Whitney

Whitney Andres

Santander Consumer USA Inc.

HR Business Partner

PHONE 214.237.3579 MOBILE 214.460.0839

WEB wandres@santanderconsumerusa.com
www.santanderconsumerusa.com

From: Paula Blayney

Sent: Monday, December 28, 2015 3:06 PM

To: Whitney Andres; TEAM HRIS

Cc: Angelina Hullum; Andrea Ashley; Susan Odom; Yessica Adriano; Reena Mathew; Stephanie Elad

Subject: RE: Holiday Pay

Good afternoon,

I want to make sure that we are all on the same page regarding the Christmas holiday hours populating for those Associates that clocked in after sign off was completed by payroll.

- Sign-Off will need to be removed
- Holiday hours will now populate
- Email payroll your 1 complete list of associates that need the holiday hours added with the EE name and ID

If you have any question please let us know.

Please pass this along to ALL HR.

Tks

Paula Blayney

Santander Consumer USA Inc.

HRIS Manager

Mobile-214-354-6913

From: Whitney Andres

Sent: Monday, December 28, 2015 1:36 PM

To: TEAM HRIS
Cc: Angelina Hullum
Subject: Holiday Pay

Good Morning-

We are receiving several emails regarding holiday pay either being entered when it shouldn't be or needing to be entered, but they have come in after the pay period was signed off on. I was informed that HRIS would be making these updates. Should we be collecting a list of associates to send to HRIS or to payroll, or is this being handled by Kronos?

Thanks,

Whitney

Whitney Andres

Santander Consumer USA Inc. HR Business Partner

PHONE 214.237.3579 MOBILE 214.460.0839

WEB wandres@santanderconsumerusa.com
www.santanderconsumerusa.com

Don Uloth

From: Reena Mathew <rmathew@santanderconsumerusa.com>

Sent: Tuesday, January 19, 2016 11:34 AM

To: reenasara@hotmail.com

Subject: FW: Holiday Pay

From: Reena Mathew

Sent: Monday, December 28, 2015 5:41 PM

To: Yessica Adriano Subject: RE: Holiday Pay

NP at all!

From: Yessica Adriano

Sent: Monday, December 28, 2015 5:22 PM

To: Reena Mathew Subject: Re: Holiday Pay

Thank you Reena!!

Sent from my iPhone

On Dec 28, 2015, at 5:13 PM, Reena Mathew <rmathew@santanderconsumerusa.com> wrote:

HI Whitney,

Here's what we have so far for LEW (none of the holidays populated for these due to them clocking in after the sign off as well as having PTO keyed):

Kim Ellis #010904 Sarah Chitukutuku #011005 Andrew Holcombe #008468 Jetamieia Van #100885

Rachel McNeal #101636—Has VAC-EX for 12/24 and holiday isn't populating

Happymore Mundoringisa #014374—Has VAC-EX for today (12/28) and holiday isn't populating

Thanks! Reena

From: Whitney Andres

Sent: Monday, December 28, 2015 3:08 PM

To: Paula Blayney

Cc: Angelina Hullum; Andrea Ashley; Susan Odom; Yessica Adriano; Reena Mathew; Stephanie Elad

Subject: RE: Holiday Pay

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 110 of 377 PageID 935 Thank you Paula- I have reached out to HRBP's & HRG's at Lew & COD and I will be compiling a list to send to payroll.

Thanks again!

Whitney

Whitney Andres

Santander Consumer USA Inc. HR Business Partner

PHONE 214.237.3579

MOBILE 214.460.0839

WEB www.santanderconsumerusa.com
www.santanderconsumerusa.com

From: Paula Blayney

Sent: Monday, December 28, 2015 3:06 PM

To: Whitney Andres; TEAM HRIS

Cc: Angelina Hullum; Andrea Ashley; Susan Odom; Yessica Adriano; Reena Mathew; Stephanie Elad

Subject: RE: Holiday Pay

Good afternoon,

I want to make sure that we are all on the same page regarding the Christmas holiday hours populating for those Associates that clocked in after sign off was completed by payroll.

- Sign-Off will need to be removed
- Holiday hours will now populate
- Email payroll your 1 complete list of associates that need the holiday hours added with the EE name and ID

If you have any question please let us know.

Please pass this along to ALL HR.

Tks

Paula Blayney Santander Consumer USA Inc. HRIS Manager Mobile-214-354-6913

From: Whitney Andres

Sent: Monday, December 28, 2015 1:36 PM

To: TEAM HRIS
Cc: Angelina Hullum
Subject: Holiday Pay

Good Morning-

We are receiving several emails regarding holiday pay either being entered when it shouldn't be or needing to be entered, but they have come in after the pay period was signed off on. I was informed that HRIS would be making these updates. Should we be collecting a list of associates to send to HRIS or to payroll, or is this being handled by Kronos?

Thanks,

Whitney

Whitney Andres

Santander Consumer USA Inc. HR Business Partner

PHONE 214.237.3579 **MOBILE** 214.460.0839

wandres@santanderconsumerusa.com
web www.santanderconsumerusa.com

This e-mail is covered by the Electronic Communications Privacy Act, 18 U.S.C. Sections 2510-2521. The information contained in this e-mail is confidential and intended only for use of the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this message in error or there are any problems please notify the originator immediately.

The unauthorized use, disclosure, copying or alteration of this message is strictly forbidden. This mail and any attachments have been scanned for viruses prior to leaving sender's company network. Neither the sender nor the sender's company will be liable for direct, special, indirect or consequential damages arising from alteration of the contents of this message by a third party or as a result of any virus being passed on.

Sender's company accepts no liability for the content of this email or its attachments, or for the consequences of any actions taken on the basis of the information provided, unless that information is subsequently confirmed in writing.

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 112 of 377 PageID 937

From: Pamela Blackburn <pblackburn@santanderconsumerusa.com>

To: Stephanie Elad <selad@santanderconsumerusa.com>

Subject: Re: R.Mathew

Date: Thu, 31 Dec 2015 01:40:10 +0000

Importance: Normal

Hi Stephanie,

I spent a lot of time with Steve discussing this today and I think we reached the right decision, so no big surprises to worry about. I did not support his initial recommendation as I felt it replaced one risk with another. I am much happier with where we landed.

My laptop has decided to beak tonight - I have IT trying to fix it remotely, but limited hope of that, so will either call or email you more tomorrow, so you know what to expect. Essentially, documentation isn't sufficiently robust to take formal action, so extending PIP to end of Q1 with weekly check-ins that will be documented. An additional column to be added to PIP where she and we will add specific actions to be taken,eg a time management course, etc, and we'll require her to sign a commitment to these. If her performance doesn't improve, we reserve the right to add DA during the process, so we are providing an opportunity for her to improve, but being very clear that if we don't see that improvement we will hold her accountable for this and act accordingly.

This would stack up in our favor in Arbitration or open hearing.

Hope that helps! I do agree though that Steve should meet u first and then the team.

P

Sent from my iPhone

On Dec 30, 2015, at 3:25 PM, Stephanie Elad <selad@santanderconsumerusa.com> wrote:

Just thought you should see this. If you think I'm wrong here, please let me know. I just don't want to have to manage my reaction to whatever he's going to say about this matter in front of my team. And, I don't want to put either of them on the spot either. They will share their thoughts and concerns with me, but they likely won't with him. They don't have that level of trust yet.

I know you are working on this and I appreciate it. Just wanted to keep you in the loop on the latest.

From: Stephanie Elad

Sent: Wednesday, December 30, 2015 3:22 PM

To: Stephen Shaffer Subject: RE: R.Mathew

Can you and I discuss first, prior to bringing Yessica back in to the discussion? I don't know that I'll feel completely open to share my thoughts with you if Yessica is there.

And, I think we can circle back with Angelina a little later down the road on this. If there are learnings for her, I can review with her at a later date. She already understands that she should have documented her conversations with Reena more effectively.

From: Stephen Shaffer

Sent: Wednesday, December 30, 2015 3:10 PM **To:** Stephanie Elad; Yessica Adriano; Angelina Hullum

Cc: Stephen Shaffer **Subject:** R.Mathew

Hello all,

Is there any chance (I know Yessica is out right now), we can get together at NRH on Tuesday, January 5 in the morning (not necessarily first thing).

I would like to review with you my findings on Reena's situation, how we should proceed, and make sure we are on the same page with how we will proceed.

Let me know if that works and suggest a time and place.

Thanks for your patience and have a great holiday!

Regards,

Stephen Shaffer

Santander Consumer USA Inc. VP Human Resources Business Partnership

PHONE 214.722.4580 MOBILE 469.236.5931

EMAIL <u>sshaffer@santanderconsumerusa.com</u>
WEB www.santanderconsumerusa.com

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 114 of 377 PageID 939

From: Angelina Hullum <AHULLUM@santanderconsumerusa.com>

To: Stephanie Elad <selad@santanderconsumerusa.com>, Yessica Adriano

<YADRIANO@santanderconsumerusa.com>

Cc: Stephen Shaffer <sshaffer@santanderconsumerusa.com>

Subject: RE: Headcount

Date: Mon, 11 Jan 2016 18:50:23 +0000

Importance: Normal

Based on current headcount, here is the breakdown:

LEW/8585 1017/2 = 508 (Reena & Sabrina)

• NRH 1461/4 = 365 (Kristen, Whitney, Jeanette, Nicole)

• COD 524/1 = 524 (AJ)

From: Stephanie Elad

Sent: Monday, January 11, 2016 12:29 PM **To:** Angelina Hullum; Yessica Adriano

Cc: Stephen Shaffer **Subject:** RE: Headcount

Can we look at it by total headcount by site and then divide by number of BP's and G's at that site?

From: Angelina Hullum

Sent: Monday, January 11, 2016 11:51 AM

To: Stephanie Elad; Yessica Adriano

Cc: Stephen Shaffer **Subject:** RE: Headcount

I stand corrected. Reena's group includes 8585, so that number is correct. However, it breaks down to 680 at LEW and 224 at 8585. So, I wouldn't say all of that is Reena's.

From: Angelina Hullum

Sent: Monday, January 11, 2016 11:45 AM

To: Stephanie Elad; Yessica Adriano

Cc: Stephen Shaffer **Subject:** RE: Headcount

Something's wrong with the formula. I will have Nicole fix it. Reena only has 680 total.

From: Stephanie Elad

Sent: Monday, January 11, 2016 11:39 AM **To:** Yessica Adriano; Angelina Hullum

Cc: Stephen Shaffer **Subject:** FW: Headcount

Hi – can you both take a look at this? If it's correct then Reena does have an increased workload compared to Whitney. I realize Whitney is doing double duty right now. We may need to look at moving some groups to Kristen, at least for now. Thoughts?

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 115 of 377 PageID 940 From: Nicole Heinicke

Sent: Monday, January 11, 2016 10:56 AM

To: Kristen Lagunes; Whitney Andres; Jeanette Rodriguez; Reena Mathew; Sabrina Boyd; Melissa Lawson; Andrew

Scordo

Cc: Angelina Hullum; Yessica Adriano; Kayla Liggett; Stephanie Elad; Edward Fabritiis

Subject: Headcount

Hello!

We have updated the Headcount report for this week. Please let me know if you have any questions. It can be found in the headcount folder on the G Drive. (G:\HR Site Folders\NRH\Headcount)

Thanks! Nicole

Nicole Heinicke

Santander Consumer USA Inc. HR Generalist

214.452.7016 PHONE MOBILE 214.212.8260

EMAIL nheinicke@santanderconsumerusa.com WEB www.santanderconsumerusa.com

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 116 of 377 PageID 941

From: Yessica Adriano < YADRIANO@santanderconsumerusa.com>

To: Stephanie Elad <selad@santanderconsumerusa.com>

Cc: Angelina Hullum < AHULLUM@santanderconsumerusa.com>

Subject: RE: 8585 Coverage

Date: Wed, 13 Jan 2016 18:04:22 +0000

Importance: Normal

Agreed, if both Kristen and I are going twice a week there is no need for Sabrina to go.

Lina, thank you for your assistance and support with this!!

From: Stephanie Elad

Sent: Wednesday, January 13, 2016 11:55 AM

To: Yessica Adriano

Cc: Angelina Hullum; Stephen Shaffer

Subject: 8585 Coverage

Hi – I spoke to Angelina yesterday. She was supportive of Kristen covering 8585 for the next few months, until it closes. And, she already spoke with Kristen about it. Kristen will go there 2x/week, starting next week. Please coordinate your coverage schedule with Kristen's each week.

We can inform Reena when we speak to her on Friday and then you can inform Alicia/Mario/Jeff etc.

Kristen will advise you regarding any escalated ER issues that require your attention. Also, let's discuss if we need to have Sabrina continue to go there. If you go 2x/week and so does Kristen, that seems like adequate coverage to me. But, maybe I'm missing something.

Thanks! And, thanks to Angelina and Kristen for their support. ©

Stephanie Elad, SPHR

Santander Consumer USA Inc. Director, Human Resources

PHONE 214.237.3713 MOBILE 214.695.1278

EMAIL <u>selad@santanderconsumerusa.com</u>
WEB www.santanderconsumerusa.com

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 117 of 377 PageID 942

From: Yessica Adriano < YADRIANO@santanderconsumerusa.com>

To: Stephanie Elad < selad@santanderconsumerusa.com>

Subject: Updated PIP and Action Plan- Use this one

Date: Wed, 13 Jan 2016 14:15:13 +0000

Importance: Normal

Attachments: Reena_PIP.doc; Reena_90_Day_Action_Plan.docx

Hello Stephanie,

This is the updated PIP (eliminated Section III) and I attached the action plan again so you have it all in one email.

Thanks



Santander Consumer USA Inc. Performance Improvement Plan (PIP)

SECTION I: ASSOCIATE INFORMATION

Associate Name: Reena Mathew

Associate ID: 013696

Associate Job Title/Department/Location: HR Business Partner/Advocacy/Lewisville

Hire Date: 01/31/2011 Time in Position: 5 years

Manager/Supervisor Name and Title: Yessica Adriano/Manager of Human Resources

Department Director/VP Name and Title: Stephanie Elad, Director Stephen Shaffer, VP

Effective Date: 90 days (starting 01/15/16)



SECTION II: PERFORMANCE STANDARDS AND ASSESSMENT

This section should clearly outline the performance standards that need to be achieved as a minimum acceptable performance standard.

Performance Standards	Actual Performance Delivered
(What needs to be achieved, as set in job description)	(What has been occurring, Facts)
Integrates Company Values into all activitiesin order to meet demands of the business, it is expected that all Associates be punctual and adhere to scheduled work hours.	Reena continually asks to leave early and struggles to adhere to her work schedule. In many instances, she only provides a same day notice. (See Addendum for specifics)
Seamlessly executes a full range of duties aligned to deploy HR strategy and objectives into client group.	Reena has had difficulty completing objectives on a timely basis. When projects/tasks arise, she relies on the assistance of other people for completion. Examples include: DA administration, monthly side by sides, WD maintenance, and assistance with the HR inbox.
Demonstrated ability to work under pressure, appropriately prioritize and organize work effectively.	As situations arise, Reena has not been proactive in using resources and contacting other HR leaders to find responses or handle escalated situations. Examples include: Payroll during holiday week and having the business wait on resolution when HRM was on vacation
	(See Addendum for specifics)
Proactively minimizes legal risk by ensuring client's compliance with company policies and procedures. Makes recommendations, provide solutions, and resolve issues as challenges.	As an HR consultant to the business, it is necessary to be able to make fair and sound judgments when conducting investigations. Reena underestimated a concern brought forth from an employee, did not follow through, and when notified of her decision delayed appropriate actions including processing the termination- which led to a risk event. In addition, in a couple situations she did not secure the objectivity of the room when questioning associates.
Needs to understand HR processes and be able to provide clear, accurate responses to	Several business units have brought forward concerns on Reena's ability to support their groups efficiently due to untimely responses, vague and inaccurate information.
business units. Builds collaborative relationships and gains credibility with operations management and associates.	Senior business leaders were disturbed that Reena had questioned and addressed them for bringing forward their concerns (mentioned above). Reena should remain professional and not initiate, or respond, to these types of discussions, as the business clients' confidentiality and right to raise issues must be respected. This action can be considered as intimidation and is not appropriate.

As an associate of SC, we expect performance to be in line with the standards outlined in the job description as well as those of your management team. The goal of this PIP is to align delivered performance to expected performance and assist in making you a successful member of the team.

You are expected to perform to the standards listed in the Action Plan (separate document). Examples are provided regarding instances where performance is not meeting expectation for the role.

As SC provides the resources required to meet the standards, immediate and sustained improvement is expected. Your work will be monitored for compliance with the performance standards on the Action Plan. If you do not meet and



maintain performance to the standards as outlined, you may receive the next level of discipline which, in this case, could range from formal disciplinary action, up to and including Termination.

SECTION III: ASSOCIATE COMMENTS

Associate Comments		

Your signature below represents that we have communicated our concerns and that you have received this document.

Associate Name	Signature	Date	
Manager Name	Signature	Date	

Addendum Timeline of Events

February 11, 2015

- Was asked to provide a summary of information from an HR luncheon attended, summary never received.

April 9, 2015

- March Recap: Reflected 2 side by sides and 4 jumpstarts for the month, number of meeting with business leaders was not quantified.

May 18, 2015

 April Recap: Jumpstarts were not attended for the month, trainings not conducted, and number of meetings with business leaders was not quantified.

July 1, 2015

- Requests to leave half day to attend doctor's appointment, same day notification

July 2, 2015

- Asked by HR Manager (HRM) to correct onboarding discrepancies in WD, asked if this could be assigned to another dept.

July 10, 2015

 Asked by HRM to support the Credit Card Department at 8585 due to the shortage of staff and unbalanced workload, asked for assistance felt overwhelmed with current duties

August 13, 2015

- July Recap: One side by side held, attended 3 jumpstarts, stated 10+ meetings attended with the business, and recap of training held with one manager

August 23, 2015

- Texts manager to advise of late arrival for the next day, HRM had to rearrange her schedule to provide site coverage

July-August 2015

- Stated the work load was heavy, asked by HRM to provide a time study to pinpoint where her time was being allocated to. Due to the lack of specifics, was asked twice to complete assignment
- Continually reminded to work full shifts and provide sufficient notice when requesting to leave early
- Strongly advised of the importance in submitting DA's to the business in a timely manner, and addressed on not leaving all DA entries solely to the generalist, everyone needed to assist with the workload.
- Manager constantly stepped in to finalize pending DA's and process terminations

September 1, 2015- Transitioned to New HRM

September 3, 2015

- Requested to leave half day on Friday, September 4 due to traveling, advised she could leave early but needed to provide a greater notification, and needed do her best to work most of her shift.

September 4, 2015

- Came in at 9 am and left at 2 pm.

September 17, 2015

- Same day notification to leave early, had flight the next day

September 28, 2015

 Discussed work load with HRM, Reena feels overwhelmed and there isn't enough time- had long conversation on how the HRBP level requires a "high level of efficiency"

October 12, 2015

 Discussed workload with HRM, and asked what was consuming her time, she did not quantify, asked for assistance with investigation checklist

October 29, 2015

- Brad, site Director, notifies HRM that they have 10 DA's pending from Reena, upon speaking with her she states she was behind and had asked the AVPs to give her until Friday. Advised DA's are time sensitive and if she is behind she needs to let me know, so we can assist in getting those out.
- Also requests to arrive to work late for tomorrow, Friday October 30th, she had a doctor's appointment and could not miss it. HRM had to rearrange schedule to provide coverage for site. She arrives to the office at noon. Advised understood emergencies/life happens but in circumstances where a greater notification can be given, it needs to be done.

November 6, 2015

- Received specific instruction from HR Director on how to communicate to the business the denial of a bereavement request, instruction not followed and additional time and resources spent on the issue

November 9, 2015

- Upon HRM's return, was provided feedback on time management, provided example of bereavement request

November 16, 2015

- Same day notification on needing to leave early, later asked for assistance with NH class, team had to stay later to cover workload.

November 17, 2015

- Reminded her of the importance of prior notification when wanting to leave early, as it impacts the team. Advised how team came in early and stayed late to cover, advised if in the future work is pending leave requests will be denied.
- Stated she felt overwhelmed with work load, when asked what is consuming her time she mentioned DA's (5), filling out the info forms for TA (7), emails, and just overall busy.

November 20, 2015

 Contacted HRM stated she was extremely busy, asked if Ten could help her. Ten handled the pending investigation.

November 23, 2015

- Reena received Deidra's resignation on Saturday, November 21st and did not process termination. The termination was not conducted until late in the afternoon Monday, November 23rd by HRM. Upon

- reviewing situation, employee had brought forth concerns in previous months- the situation was mishandled and was not followed up on.
- Provided term recommendation which was vague stating (see AVP notes below) explained the importance
 of summarizing and had her resend- which she did. In addition, asked for the surrounding circumstances
 of incident, upon review advised her three people questioning one employee was overwhelming and we
 need to safeguard objectivity of the room.

November 24, 2015

- Asked for assistance with 5 info security issues, advised her everyone's pending workload and asked for clarification on what she was doing. She stated she would like to discuss further

November 25, 2015

- Same day notification of Dr.'s appointment, took a longer lunch. Advised again, that a greater notification must be given- same day notices impacts the team and workload.

December 8, 2015

- Receive concerns from the VP and SVP for the credit cards group in regards to Reena's timeliness and questioned how she was handling an investigation. They felt she had already reached a conclusion prior to looking into the matter. They requested another HR member review and finalize the case.

December 22, 2015

- Senior leadership members advise that Reena had approached them questioning the concerns they had brought forward, they stated they felt uncomfortable and surprised by this action.

December 28, 2015

- HR Generalist had to be called in on their time off to gather, organize, and help solve payroll discrepancies in order to meet deadline. As an HRBP and tenured employee, it is expected that Reena proactively work with other peers and departments to reach consensus and find solutions during these situations.



90 Day Action Plan

Name: Reena Mathews Plan Period: 90 days (starting 1/15/16)

Purpose: To outline specific actions required to correct performance discrepancies and identify training/resources

available.

Area of Focus	Action/Tasks	Support/Resources	Review Dates
Attendance	Reena must provide a minimum of a 48 hr notice (aside from emergency situations) when requesting time off, late arrivals, or early departures.		Bi weekly basis with HR Manager effective 01/18/2016
	Manage time and hours efficiently to ensure work expectations are delivered, communicate any gaps that could potentially impact the Business. Reena is responsible for managing her time and her schedule as an exempt Associate and ensuring that the needs of the business are met.	Reena will complete and submit a time tracking study every week to her Manager. This will be reviewed and discussed on a bi-weekly basis. If Reena would like additional support/training in this area, she should let her Manager know by 2/1/16 and a representative from the Talent Development team will be engaged to provide counsel and recommendations.	
Time Management & Effective Work Habits	All requests and inquiries to our business units are to be responded to within a 24 hr time frame. If a complete answer is unavailable, then a follow up response with an expected ETA should be provided. Disciplinary Actions (DA) forms need to be delivered primarily within a 24 hr time frame, not to exceed 48 hrs (excluding holidays and weekends).	Reena's workload has been reduced to help her succeed, she will only provide HR support to the LEW site, effective 1/18/2016. Responsibility for 8585 will transition to another member of the team.	Bi weekly basis with HR Manager effective 01/18/2016
	Provide support in all areas of the business to include administrative tasks. For example: checking the HR box, scanning documents to appropriate departments and/or entering DA's into Workday.	If Reena would like additional training on any of SC's processes or practices (including payroll, WD, etc), she can submit a list of topics to her Manager by 2/5/16 and this will be arranged.	,,,
Consulting	Reena needs to follow established policies, be thorough with every situation/concern brought forth. When handling investigations, use the checklist prior to starting an investigation to ensure no element is excluded. Review all findings with HR Manager prior to making business recommendations.	If Reena is interested in pursuing training courses to provide additional development in this area, she should let her Manager know by 2/1/16 and she will be put in touch with a member of SC's Talent Development team for	Bi weekly basis with HR Manager effective 01/18/2016

SC Action Plan Revised 01/2016

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 126 of 377 PageID 951

a	Jein aot
	40 . 1 .
	Santander
	CONSUMER USA
	CONSUMER USA

		counsel and recommendations.	
	Provide accurate and clear answers to business clients. If unsure on a response, Reena needs to take a proactive approach and use all resources available (other depts and/or peers) to get confirmation.	If Reena feels she needs additional development in this area, side by side shadowing sessions can be set up with another HRBP. Reena should let her Manager know by 2/1/16 if she would like to pursue this option.	
hope that she com	to providing additional resources and support pletes this Action Plan successfully. In order to covement against the action plan outlined abo	o achieve this, Reena needs to de	• • •

Associate Signature	Discussion Date
Manager Signature	HR Approval

SC Action Plan Revised 01/2016

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 127 of 377 PageID 952

From: Stephanie Elad < selad@santanderconsumerusa.com>

To: Yessica Adriano < YADRIANO@santanderconsumerusa.com>

Cc: Stephen Shaffer <sshaffer@santanderconsumerusa.com>

Subject: RE: Reena Meeting Recap 01/15/16 **Date:** Mon, 18 Jan 2016 22:31:33 +0000

Importance: Normal

Thanks for the recap! I think you covered just about everything. I just have a few points to add:

- When you brought up the Google example (for the Associate who was alleged to have falsified her bereavement documentation), I reminded her that I had coached her at the time that I felt that she and Sabrina had spent too much time looking into this issue, and also provided specific direction on how the incident should have been handled. Reena stated that I had provided feedback but that it wasn't coaching. I then explained that if Yessica or I provide direction on how to handle something differently, that is coaching, even if we don't preface the conversation by specifically stating "this is coaching".
- Reena stated that Angelina had been on the HRBP call and had attempted (unsuccessfully) to halt the discussion around the PIP's. When we asked her to explain, she refused. Later that day, I called Angelina and asked her about this. She stated she wasn't on the call and wasn't aware of the content until afterwards, when one of her team members brought it to her attention.
- She asked for examples several times and claimed that she had not been provided with examples thus far. However, when Yessica and I shared examples with her, she would argue with them and state that the facts we presented were not true.

From: Yessica Adriano

Sent: Monday, January 18, 2016 11:36 AM

To: Stephanie Elad

Subject: Reena Meeting Recap 01/15/16

Good morning,

I wanted to share with you my summary of our meeting with Reena on Friday, 01/15/2016

We started the meeting by letting her know we had taken her concerns into consideration and taken a step back and reviewed this process. Her annual review was modified for 2015 to a satisfactory rating and she would be receiving her merit and bonus. Our goal was to see her succeed in her role and the PIP and action plan that we were going to discuss were created with that in mind.

- She immediately became upset and questioned why she was being placed on two PIPs, it was explained that there isn't two PIPs as the other one was rescinded. The PIP addressed the performance gaps that still existed and it outlined additional concerns that have come to light. We explained the PIP was extended to a 90 day period to give her enough time to make necessary changes. Reena stated we just wanted her out of here and why didn't we just fire her now, and that this was all so unfair.
- Reena went on to share she was being blindsided again since she was never coached before, I provided her
 examples of conversations where her performance was addressed (ie: calling her with Brad's concern over DA
 delivery). She responded with that was feedback and not a coaching session. I provide additional examples and
 even Stephanie shared an example (google), Reena stated once again these are feedback and not coaching
 sessions.
- She went on to say on the HRBP call, Susan was talking about PIPs and before anyone can be placed on one they needed to be coached and need to have documentation. Also, Lina was on that call and told Susan to stop talking about PIPs. Stephanie explained we are unaware of what she is talking about, though the PIP is not the last step but first step in addressing and correcting performance.

- Rassa also stated sheeter received the table in the local sheet and shared some of the 12/01/2015 she wanted examples and I went over each item on the timeline and shared some of the comments she made to them. I reminded her that she had stated she didn't want that (timeline) because Lina and I can easily make up things and put it on paper.

Attendance, Reena stated everyone left early she isn't the only one who does it

- I proceeded to go over PIP form explaining the columns and performance areas:

HRBP duties, Reena answered by saying she had been here 5 years she knows how do everything and does not need help. She wanted examples shared the DA timeframes and payroll incident, explained how I needed her to be proactive and resolve these issues as I couldn't guide her with every step, and had to have generalist come in to resolve as I had an urgent matter to attend to

Consulting, she accepted the feedback with the D. Crouch investigation and agreed. In regards to the further issues, she wanted names and examples of who made complaints. Advised we do not provide names, provided example how in certain emails she responded to AVPs with probably, and we need to be clear on responses and shared the concerns from the credit card group. Had discussion on her turnaround time of one DA, Reena stated she had it done within 48 hours. I asked if the task takes 5 minutes why not just deliver it to the business, instead of responding to their 3 emails where they are asking for it. We also advised Reena we have more than one business unit sharing their concerns of how she has handles things and her timeliness. Reena went on to say, she shared an example of a complaint one manager made on another HRBP, what were we doing to them. Explained to her, being in HR she should know we do not discuss other employees matters. In regards to addressing the business for sharing their concerns, she denied it and then admitted to speaking to Jorge and Sam but

We went over the action plan and its layout:

she was just wanting to know if there was any issue

Time Management, went over expectations she was upset of having to submit a time tracking study, stating she doesn't have time for that and why does she have to do it. Advised if she states she is busy, then we need to know where her time is being consumed by. Again, disagreed that she had already done it for Lina and myself and doesn't know why she has to do it again, and I didn't give her feedback on her last one.

After the meeting I went back to my meeting notes with Reena, on December 10, 2015 Reena shared with me what she had written down for her time study for the past couple days. I advised to keep with the 30 minutes increment and advised where she needed to have more detail.

We went over how she would no longer have 8585, so she could focus on her plan and the Lewisville site. Reena became upset and offended, stating she has been here 5 years and knows how to do her job, and her lasting that long says something. We went over the rest of the plan, as I went over additional examples she would respond sarcastically.

Overall, throughout the discussion Reena was extremely defensive, anti-agonistic and at times borderline aggressive. Reena reminded us a few times that she is pregnant. She stated she was never coached, and this was unfair. I advised of how disappointed we were because we listened to her original concerns didn't want to impact her monetarily, that was solved, but the performance still needed to be addressed and corrected. I also mentioned the action plan provides a clear direction and we have enough lessened her load and provided additional resources to see her succeed in this plan. Stephanie and I stressed her success depends on her willingness to move forward. Stephanie shared a personal example of a time she received feedback she didn't like, she had to accept it, made changes, and moved on successfully. Reena was still upset and again said that this is unbelievable you are placing me in two PIPs and asked for the documents and would review and decide if she would sign.

Yessica Adriano, SPHR, SHRM-SCP

Santander Consumer USA Inc. Manager Human Resources

PHONE 214.722.5667 MOBILE 214.215.5258

 EMAIL
 yadriano@santanderconsumerusa.com

 WEB
 www.santanderconsumerusa.com

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 129 of 377 PageID 954

From: "Reena Mathew" </O=D6ORG/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=REENA MATHEW0CB>

To: "Stephen Shaffer" <sshaffer@santanderconsumerusa.com> **Bcc:** "reenasara@hotmail.com" <reenasara@hotmail.com>

Subject: RE: Meeting you requested

Date: Mon, 18 Jan 2016 17:32:23 +0000

Importance: Normal

Attachments: Time Line of Events--Reena's Notes.docx

Will do—I was also provided a timeline on Friday. I had mentioned to you Stephen that my concern was that anyone can come up with a timeline (the issue is whether what is stated is accurate and there isn't any acknowledgment from the other side).

Upon reviewing it, I found several statements that were very concerning and wrote my side in red.

Again, no one has ever sat me down to let me know there were any performance gaps and all I have received up until now is a timeline with alleged issues from a year ago (which I never even knew were issues).

Please see the attached and we can discuss when we meet.

Thanks, Reena

From: Stephen Shaffer

Sent: Monday, January 18, 2016 11:12 AM

To: Reena Mathew **Cc:** Stephen Shaffer

Subject: RE: Meeting you requested

Great. Please send me a meeting request for an hour. You can select or reserve a room.

Thanks

Stephen Shaffer

Santander Consumer USA Inc.

VP Human Resources Business Partnership

PHONE 214.722.4580 MOBILE 469.236.5931

EMAIL <u>sshaffer@santanderconsumerusa.com</u>
WEB www.santanderconsumerusa.com

From: Reena Mathew

Sent: Monday, January 18, 2016 9:53 AM

To: Stephen Shaffer

Subject: RE: Meeting you requested

That's fine. Let's do 10am then.

Thanks, Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 130 of 377 PageID 955

From: Stephen Shaffer

Sent: Monday, January 18, 2016 9:18 AM

To: Reena Mathew **Cc:** Stephen Shaffer

Subject: RE: Meeting you requested

Hi Reena,

Either 10am or 2pm would work for me. I have to move a lunch meeting from downtown to Lewisville which is ok, but I told the gentleman I would meet him around 11:30am

Let me know which works better. I can also do 9am or 3pm if neither of these works.

Thanks

Stephen Shaffer

Santander Consumer USA Inc. VP Human Resources Business Partnership

PHONE 214.722.4580 MOBILE 469.236.5931

EMAIL <u>sshaffer@santanderconsumerusa.com</u>
WEB www.santanderconsumerusa.com

From: Reena Mathew

Sent: Monday, January 18, 2016 9:09 AM

To: Stephen Shaffer

Subject: RE: Meeting you requested

HI Stephen,

Wednesday works for me.

Does 11am work for you?

Thanks, Reena

From: Stephen Shaffer

Sent: Monday, January 18, 2016 9:05 AM

To: Reena Mathew **Cc:** Stephen Shaffer

Subject: Meeting you requested

Good morning Reena,

I responded to your request for a follow-up meeting last week, indicating I could come to LEW on Wednesday of this week.

To do so, I do need to move a couple of appointments.

Thank you

Stephen Shaffer

Santander Consumer USA Inc. VP Human Resources Business Partnership

PHONE 214.722.4580 MOBILE 469.236.5931

EMAIL <u>sshaffer@santanderconsumerusa.com</u>
WEB <u>www.santanderconsumerusa.com</u>

Addendum Timeline of Events

February 11, 2015

- Was asked to provide a summary of information from an HR luncheon attended, summary never received—I did provide a summary, just need access to my Sent folder. If this was an issue, how come I was never asked about it till a year later?

April 9, 2015

- March Recap: Reflected 2 side by sides and 4 jumpstarts for the month, number of meeting with business leaders was not quantified. ?? What does this mean? Was never told anything when this was submitted.

May 18, 2015

- April Recap: Jumpstarts were not attended for the month, trainings not conducted, and number of meetings with business leaders was not quantified ?? Same as above.

July 1, 2015

- Requests to leave half day to attend doctor's appointment, same day notification ?? What is the point of listing these? Everyone in the office at some point left early due to unforeseeable events; this was for child that was sick and Dr could see them that day.

July 2, 2015

- Asked by HR Manager (HRM) to correct onboarding discrepancies in WD, asked if this could be assigned to another dept. Had an extremely heavy load as well as Sabrina did—this was an admin tasks. Why would this be an issue if we needed a little extra help? I barely ask for help when I was undertaking an extremely heavy load.... I had the heaviest one out of all the HRBP's so why am I being penalized for asking for help on something the HRG's should be doing either way?

July 10, 2015

- Asked by HRM to support the Credit Card Department at 8585 due to the shortage of staff and unbalanced workload, asked for assistance felt overwhelmed with current duties False statement—I did it and I did it without any issues at either site. At times, I did state I was extremely busy but who wouldn't be with that kind of workload? Not unbalanced......I took over what an NRH BP had been doing previously. Was doing it effectively and even when we were site specific, I still was over the department without any complaints.

August 13, 2015

- July Recap: One side by side held, attended 3 jumpstarts, stated 10+ meetings attended with the business, and recap of training held with one manager—What does this mean??

August 23, 2015

- Texts manager to advise of late arrival for the next day, HRM had to rearrange her schedule to provide site coverage—Texted this day before as it was my daughter's first day of Kindergarten—HRM said, 'Sure, no problem' (I have text message). If it was an issue, I should've been coached or told no.

July-August 2015

- Stated the work load was heavy, asked by HRM to provide a time study to pinpoint where her time was being allocated to. Due to the lack of specifics, was asked twice to complete assignment—Did not know

- what this was for; HRM gave me no direction, just asked me to list what I did on a daily basis and then gave me specifics (every 15 minutes) the next time and never followed up on the time study.
- Continually reminded to work full shifts and provide sufficient notice when requesting to leave early ??
 When??
- Strongly advised of the importance in submitting DA's to the business in a timely manner, and addressed on not leaving all DA entries solely to the generalist, everyone needed to assist with the workload??

 Untrue, when???? Never had this type of conversation.
- Manager constantly stepped in to finalize pending DA's and process terminations—Took pre-approved time off and rarely called in--when did you step in????

September 1, 2015- Transitioned to New HRM

September 3, 2015

- Requested to leave half day on Friday, September 4 due to traveling, advised she could leave early but needed to provide a greater notification, and needed do her best to work most of her shift. Completed all my work before I left and only left closer to 3:45/4p. What did you have to cover?

September 4, 2015

- Came in at 9 am and left at 2 pm.

September 17, 2015

Same day notification to leave early, had flight the next day ??? Did not travel this day so don't know what
you are referring to.

September 28, 2015

Discussed work load with HRM, Reena feels overwhelmed and there isn't enough time- had long conversation on how the HRBP level requires a "high level of efficiency" Never did we have a 'long conversation' if we did, where is the documentation on this because I would like to see this. At times I did feel overwhelmed, but how is that an issue for a PIP? Should've provided me with help.

October 12, 2015

Discussed workload with HRM, and asked what was consuming her time, she did not quantify, asked for assistance with investigation checklist This is a completely false statement; I informed HRM that the checklist was taking longer than anticipated (almost 10 months due to initial team being let go (3 HRBP's) and Tina was asked to step in for Back Office feedback and HRM stated there still needed to be one change made per HRD. HRM had just consulted with other HRM's about final input and said HRD wanted one last change and HRM stated she would make the last change and submit it since that was the only thing pending. Tina and I had worked on the whole thing by ourselves until it came time to get HRM input. HRM volunteered to take it from there and make change and submit so it wouldn't go back and forth one more time and we could finally get it done.

October 29, 2015

- Brad, site Director, notifies HRM that they have 10 DA's pending from Reena, upon speaking with her she states she was behind and had asked the AVPs to give her until Friday. Advised DA's are time sensitive and if she is behind she needs to let me know, so we can assist in getting those out. *Never was behind*—attended SHRM conference and sent email to AVP's stating I would have the DA's by Friday of the week as we were offsite. AVP responded and said that was fine (I have email and response from AVP). HRM mentioned to me on Thursday, 10/29 that she was speaking to Brad about Rhonda (separate issue where Rhonda had to be addressed about taking situation into her own hands) and that he had also in

- conversation asked for an update on the DA's which I got to them in a timely manner. Making it seem like he came to HR to specifically complain which is untrue.
- Also requests to arrive to work late for tomorrow, Friday October 30th, she had a doctor's appointment and could not miss it. HRM had to rearrange schedule to provide coverage for site. She arrives to the office at noon. Advised understood emergencies/life happens but in circumstances where a greater notification can be given, it needs to be done. This was first appointment for baby and HRM had been out for some time (one week) due to her move and I had no idea she was working from home Friday. I informed her it was a very important appointment and I stated I would try and get it rescheduled. Called doc office and it was a while before I could be seen so I let HRM know and she stated that was fine that she would come in. Never seemed like it was an issue and that Friday is the day I told her I was pregnant and that is why I had to go to appt. and she said it was ok and seemed very happy/excited for me.

November 6, 2015

- Received specific instruction from HR Director on how to communicate to the business the denial of a bereavement request, instruction not followed and additional time and resources spent on the issue—We let department know, but we may have let them know more than HRD wanted us to give. I will take ownership of that and have learned not to do that.

November 9, 2015

- Upon HRM's return, was provided feedback on time management, provided example of bereavement request—Time mgmt.—I literally spent 5 minutes looking up a picture for a false bereavement doc HRG asked me about. We in turn found it was fake. Literally was 5 minutes though and if we hadn't found it was fake, we would've allowed associate to get away with 3 possibly (1 for sure) fake bereavement requests. How is that an issue vs the opposite (if we hadn't looked into it and continually let associate get away with falsification of time)?

November 16, 2015

- Same day notification on needing to leave early, later asked for assistance with NH class, team had to stay later to cover workload. —It was a matter of picking up DL's/SS cards which takes all of 10 minutes. Sabrina and I split all of the documents the next day to enter in Red Carpet which is what is very time consuming. I also have IM convo where HRM was completely ok with request and didn't let me know otherwise.

November 17, 2015

- Reminded her of the importance of prior notification when wanting to leave early, as it impacts the team.
 Advised how team came in early and stayed late to cover, advised if in the future work is pending leave requests will be denied.
- Stated she felt overwhelmed with work load, when asked what is consuming her time she mentioned DA's (5), filling out the info forms for TA (7), emails, and just overall busy.????????

November 20, 2015

Contacted HRM stated she was extremely busy, asked if Ten could help her. Ten handled the pending investigation—HRM/HRG took the day off and left me completely alone on a payday Friday which was extremely busy and we had 2 investigations going on already. There should never be one person at a site on a payday Friday. Jeff called at the end of the day with this new issue and there wasn't any way I could assist being alone and asked Ten if she could assist since she was at 8585 and she had no issue at all. Another reason why 8585 should've been site specific and not covered by HRBP at LEW.

November 23, 2015

- Reena received Deidra's resignation on Saturday, November 21st and did not process termination. The termination was not conducted until late in the afternoon Monday, November 23rd by HRM. Upon reviewing situation, employee had brought forth concerns in previous months- the situation was mishandled and was not followed up on. I take ownership of this one; I could've handled situation better but was going off of what information I was given.
- Provided term recommendation which was vague stating (see AVP notes below) explained the importance of summarizing and had her resend- which she did. In addition, asked for the surrounding circumstances of incident, upon review advised her three people questioning one employee was overwhelming and we need to safeguard objectivity of the room. ?? AVP had already met with associate along with manager and had notated all the info—it was a black and white situation (falsification of time) so I stated 'please see below' in my notes. AVP/Manager and I met with associate since they had met prior and wanted to get all of the information since it had just happened that morning. Was never coached on that—was just asked to resend notes with my statement.

November 24, 2015

- Asked for assistance with 5 info security issues, advised her everyone's pending workload and asked for clarification on what she was doing. She stated she would like to discuss further –Another administrative task that is very time consuming; HR Compliance sent so many all at once and had a lot going on; per HRM stating if I needed help (when DA issue occurred), I asked for help so that we wouldn't be behind since these take a good amount of time to do. Why am I being penalized for asking for help if we are a team?

November 25, 2015

- Same day notification of Dr.'s appointment, took a longer lunch. Advised again, that a greater notification must be given- same day notices impacts the team and workload. I took Dr's appointment on my *lunch* and it was for a baby appt. How is this an issue when I am exempt and I used my lunch and am covered by FMLA? It was 15 mins over my lunch, how does that impact the business? I thought I was being courteous by using my lunch to go.

December 8, 2015

- Receive concerns from the VP and SVP for the credit cards group in regards to Reena's timeliness and questioned how she was handling an investigation. They felt she had already reached a conclusion prior to looking into the matter. They requested another HR member review and finalize the case. Never heard about timeliness of anything? HRM stated that I shouldn't let business know what I was thinking upfront until investigation was completely finished. I stated I understood. However, after my recommendation of moving associate to a different team after I had done investigation, Jeff has never had an issue after that with either associate. Prior to finding a resolution, it was a constant disruption to the team. We finally came to the right conclusion as this had been escalating for a while and could've really taken a turn for the worse.

December 22, 2015

- Senior leadership members advise that Reena had approached them questioning the concerns they had brought forward, they stated they felt uncomfortable and surprised by this action. HRM in previous meeting regarding first PIP had mentioned I received complaints from Greg Vinson, Mitzie Jefferson and Jorge Munoz which I knew were false statement as we had excellent relationships. I asked Jorge if I was getting DA's to him on time and he said yes and that he jokes about things but doesn't mean anything by them (jokes about getting DA's etc when he walks into HR). Jorge asked me was everything ok and if he needed to let HRM know that I get things done on time and I said no, everything was fine.

December 28, 2015

HR Generalist had to be called in on their time off to gather, organize, and help solve payroll discrepancies in order to meet deadline. As an HRBP and tenured employee, it is expected that Reena proactively work with other peers and departments to reach consensus and find solutions during these situations. This is not true—HRM's inadvertently allowed all HRG's to be off on the same day (that was the real issue) and no one had sent out Kronos audit. Sabrina logged in to get that out and later in the day and compiled list for Customer Servcie Holiday pay and I had finished up LEW Servicing and HRM had shown appreciation for us getting the information out. Nothing else was mentioned.

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 137 of 377 PageID 962

From: "Stephen Shaffer" </O=D6ORG/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=STEPHEN SHAFFERA87>

To: "Reena Mathew" <rmathew@santanderconsumerusa.com> **Cc:** "Stephen Shaffer" <sshaffer@santanderconsumerusa.com>

Subject: Reminder

Date: Thu, 21 Jan 2016 14:45:09 +0000

Importance: Normal

Per our meeting yesterday, you will send me a summary of our discussion by Monday, January 25, 2016.

The intent of this is to be sure we are on the same page. It helps me understand what you heard and what you feel you communicated to me.

This is not intended to be a blow by blow account, but more a summary of the key points to ensure understanding.

I will respond by Wednesday evening (January 27, 2016).

Thank you.

Stephen Shaffer

Santander Consumer USA Inc. VP Human Resources Business Partnership

PHONE 214.722.4580 MOBILE 469.236.5931

EMAIL <u>sshaffer@santanderconsumerusa.com</u>
WEB <u>www.santanderconsumerusa.com</u>



ATTORNEYS AT LAW

January 29, 2016

James Spielberger ‡†
Gary Martoccio * *
Gabrielle Klepper *† ø ★◆
Alicia D. Massidas Y ◆*
Jason Allan Watson *+*
Jeffrey Del Rio *◆‡
Jordan C. Sullivan ‡ *
Philip Kegler * ▶
Thomas Daugustinis *
Trescot Gear *

Santander Consumer USA c/o Hermes Sargent Bates, LLP Attention: Monte Hurst 901 Main St., Suite 5200 Dallas, TX 75202

RE: Your employee Reena Mathew

Dear Mr. Hurst:

Reena Mathew has retained this law firm to represent her in regards to her separation from Santander Consumer USA (hereinafter referred to as "Santander"). Please direct all future correspondence, communications, and documents regarding this matter to our firm. The purpose of this letter is to summarize briefly my understanding of what transpired and to determine your interest in engaging in a good faith effort to resolve this matter.

As you know, Ms. Mathew began working for Santander in January 2011. Throughout her tenure with Santander, Ms. Mathew has been a hard working employee who diligently performs her duties on a regular basis. Our investigation indicates that Santander's treatment of Ms. Mathew violates federal law.

In October 2015, Ms. Mathew informed Santander's Human Resource Manager that he was pregnant. Soon after informing Santander about her pregnancy, Santander placed Ms. Mathew on a performance plan without notice or warning. Ms. Mathew reported the retaliatory action to management; however, no action has been taken to address the hostile work environment.

Our investigation suggests Santander has discriminated against Ms. Mathew due to her pregnancy. Santander's recent conduct is in direct violation of Title VII of the Civil Rights Act of 1964 (Title VII), public policy, and company policy.

The applicable portions of the Title VII and Eleventh Circuit holdings read in pertinent part:

"It shall be an unlawful employment practice for an employer to fail or refuse to hire or to discharge an individual, or otherwise discriminate against any individual with respect to compensation, terms, conditions, or privileges of employment

OF COUNSEL:

ONLY LICENSED IN:
Y NY
NJ

♦ NJ + SC ‡ GA + NC *IL Ø TX * FL

★ AZ ◆ PA

♦ CO • AL Mathew 081

OFFICES

Charleston

Tampa

Chicago *

Atlanta *

Raleigh '

Orlando *

Austin*

Houston Dallas *

Buffalo *
New York *
Philadelphia*

Pittsburgh *

* by apt. only

Jacksonville*

Ft. Lauderdale*

Charlotte '

Administrative Office: 202 S. Hoover Blvd • Tampa, Florida 33609 • Phone: (800) 965.1570 • Fax: (866) 580.7499 App.172



because of such individual's race, color, religion, sex, or national origin."1

"The law forbids discrimination when it comes to any aspect of employment, including hiring, firing, pay, job assignments, promotions, layoff, training, fringe benefits, such as leave and health insurance, and any other term or condition of employment."²

[W]hen defining the level of substantiality required for a Title VII discrimination claim, we required an employee to demonstrate she suffered "a serious and material change in the terms, conditions, or privileges of employment" to show an adverse employment action.³

[C]onduct falling short of an ultimate employment decision must, in some substantial way, "alter[] the employee's compensation, terms, conditions, or privileges of employment, deprive him or her of employment opportunities, or adversely affect [] his or her status as an employee."⁴

As with other sex-based stereotypes, Title VII prohibits an employer from basing an adverse employment decision on stereotypical assumptions about the effect of pregnancy on an employee's job performance, regardless of whether the employer is acting out of hostility or a belief that it is acting in the employee's best interest.

Ms. Mathew takes great pride in her work and has enjoyed her employment with Santander. At this time we will continue to closely monitor the situation on an ongoing basis and expect that Santander will conduct its operations professionally. This is a demand for Santander to: (1) investigate Ms. Mathew's claims, (2) prevent future instances of discrimination in the workplace, and (3) contact this office to discuss a fair and reasonable resolution to this matter.

This letter serves as formal notice of your ongoing legal duty to preserve any and all information relevant to the facts surrounding this claim. Your duty to preserve evidence extends to the following: 1) business records, 2) paper, digital, or electronic files, 3) data generated by and/or stored on you or your client's computers and storage media (e.g., hard disks, floppy disks, backup tapes), 4) any other electronic data, such as: voice mails, text messages, emails, digital/analog audio recordings, 5) any related physical evidence, and 6) any form of video recordings (please prevent the automatic deletion of video footage by preprogrammed deletion cycles). Violations of the legal duty described in this notice can result in severe sanctions being imposed by the Court for spoliation of actual evidence or potential evidence.

Mathew 082

¹ Title VII of the Civil Rights Act of 1964 as amended by the Pregnancy Discrimination Act of 1978 § 703 (a).

² EEOC Compliance Manual 2011.

³ Crawford v. Carroll, 529 F.3d 961 (11th Cir.2008).

⁴ Id., (quoting Gupta v. Florida Board of Regents, 212 F.3d 571 (11th Cir.2000)).



Please note that our investigation of Ms. Mathew's claims is ongoing. So that I can document our file, please send me a written response to this letter within five days. Also, please call me at your earliest convenience to discuss your interest in resolving these issues. You can contact me directly at (800) 965-1570 ext. 128.

Best regards,

Gabrielle Klepper

gabrielle.klepper@spielbergerlawgroup.com

ce: Thomas Daugustinis, Esq. Reena Mathew

Mathew 083

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 141 of 377 PageID 966

From: "Reena Mathew" </O=D6ORG/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=REENA MATHEW0CB>

To: "Yessica Adriano" < YADRIANO@santanderconsumerusa.com>

Subject: Summary of Meeting

Date: Mon, 01 Feb 2016 18:23:51 +0000

Importance: Normal

Hi Yessica,

Per our conversation on Friday, 1/29/16, here is what we discussed:

Attendance—I've been giving 48 hour notice as well as placing time off in calendar; no issues-continue to do so.

Time Management—Work study every 30 minutes due every Friday. We will meet every other Friday (pay day Fridays) to discuss/debrief progress etc. Asked if I would like to attend any type of classes to assist; said if I came across anything would let Manager know.

Consulting—No issues at this time; would like for me to take over the investigation for Ireshia Brown—in charge of summaries, aftermath; you would like for me to respond timely to all issues/requests etc and let you know if I have any questions. Start fresh with January.

Just as a side note, we also discussed my perspective on things and how PIP had been handled in my case.

Let me know if you need anything else.

Thanks, Reena

Reena Mathew, PHR

Santander Consumer USA Inc. HR Business Partner

PHONE 214.292.2772

MOBILE 214.364.9136

FAX 214.630.0828

EMAIL rmathew@santanderconsumerusa.com

WEB www.santanderconsumerusa.com

BENEFITS HOTLINE 214.540.2010

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 142 of 377 PageID 967

From: Yessica Adriano < YADRIANO@santanderconsumerusa.com>

To: Reena Mathew <rmathew@santanderconsumerusa.com>

Subject: Example of Investigation summary- confidential

Date: Tue, 02 Feb 2016 20:08:50 +0000

Importance: Normal

Hello Reena,

I'm sharing this as a guide for you when composing an investigation summary. Let me know if you have further questions or if this helps.

Thanks

From: Yessica Adriano

Sent: Tuesday, December 15, 2015 7:34 AM

To: Stephanie Elad

Subject: D. Crouch - Investigation Summary

Hello Stephanie,

Below is an attempt at a general investigation summary for Deidre Crouch, the detailed investigation notes of every conversation I had will soon follow. I have attached a time line of events dating back from when Deidre first raised her issues. The timeline below is just of our investigation. Please review and advise if you would like for me to condense or be more specific on the summary below. My recommendation is at the end of this email, I would also like to gather your thoughts on appropriate course of actions. Thank you.

Date Complaint Received: 11/24/2015

Investigator(s): Yessica Adriano- Manager, Human Resources Complainant(s): Deidra Crouch, Collateral Recovery Specialist

Accused: Cherri Cotton – Loss Recovery Manager

Witness(es): Jeannie Palmer, Nadia Robinson, Jessica Gibson, Natassia Kinney, Nathan Jones, Chris Musso – Collateral

Recovery Specialists

Ebony Jones- Reinstatement Coordinator

Tara Stewart- AVP Loss Recovery, Jodie Kelch-VP Loss Recovery

Timeline of Investigation:

11/21/2015: Deidra Crouch's Resignation letter received

11/24/2015: Spoke with Deidre over the phone, she shared her concerns and the reasons for her departure. She was offered the opportunity to return to the NRH site.

11/25/2015: Deidre responds via email to me to verify if the position will be under Tara

HR Compliance reviews past logs and does not find a complaint from Deidre

12/1/2015: Advised the position open would still fall under Tara, and asked if she would be willing to go to Late Stage at NRH. Deidre responds same day stating due to her declined health and the treatment she endured she will not return.

12/7/2015: Spoke with 6 agents from Sherri Cotton's team, and 1 agent from a surrounding team

12/8/2015: Met with Tara Stewart, AVP Lost Recovery and Jodie Kelch, VP Loss Recovery

12/9/2015: Met with Cherri Cotton, Loss Recovery Manager

12/11/2015: Nastassia Kinney, comes to see me stating that Cherri has been nicer to the team since the day Jodie arrived and no longer places the customers on speaker phone, however she has begun to "play her like she did Deidre" through EIC comments. Advised will look into EIC and follow up with her the following week.

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 143 of 377 PageID 968

Deidre Concerns (usually the Final Incident portion, based on the situation modify as you see fit):

- Cherri treats her unfairly and humiliates her anytime she can, which caused a decline in her health and well being
- Employees were aware of her write up before she knew about it
- Brought these issues to Tara several times and she never did anything about it, went to HR, and contacted an Ethics officer
- Cherri is always sharing people's business with other employees and says mean things about everyone (examples provided)
- Cherri always puts upset customer's on speaker and mocks them

Substantiated Claims (or it can be Confirmed Accusations per the summary template)

- 2 employees state they were aware of Deidre's write up as Cherri left if on her desk and made comments in regards to it
- 2 employees confirm Cherri speaks negatively of many employees and their personal matters, examples and time frames provided
- 2 employees state that they these matters have been brought to Tara's attention several times and to HR and nothing was done but things got worse
- 1 employee confirmed how Deidre was taunted by Cherri after returning from an HR meeting
- 3 employees confirmed it is important not to get on Cherri's bad side, because of how her disposition changes (2 of them provided examples of how bad she has treated Deidre and Jeannie)
- All interviewed parties confirmed Cherri places upset customers on speaker phone, 4 of the 6 interviewed agree she laughs and does this for an entertainment value

Unsubstantiated Claims (can also be Unconfirmed Accusations):

- Deidre notifying the Ethics officer, compliance thoroughly reviewed and confirmed there is no record of this
- Deidre reaching out to Tara on 09/04/2015 to question her Final issued on 08/30/2015

Tara/Jodie Meeting Recap (only enter recaps that were crucial to your investigation):

- Jodie begins meeting by stating Misty, Reena were asked to get involved and they advised this investigation was closed with no findings
- Tara reviews how the oversight of Deidra's attendance occurred, how she reached out to have it corrected, and her thorough apology to Deidra over this. This error was caught in time and Deidra's bonus was not impacted
- Deidra brought up concerns of favoritism, bullying, log in/log outs, ,eating on the floor concerns to her. Upon her review, Cherri was doing everything correctly and was consistent in her practices
- Tara references Cherri's communication style and how it can be misinterpreted as well as hers
- Tara states the 10/20 meeting went well, she followed up on 10/27, Deidra was fine and she helped bridge the communication between her and Cherri by having her do a recap and receive kudos. The resignation letter came to her as a surprise.

Cherri Meeting Recap (Jodie Kelch Present):

- Issues with Deidre began after she was written up, Deidre just stopped speaking to her
- Claims she has never spoken negatively about any one on the team. Examples provided and she remembers another associate announcing one of these incidents, but it didn't come from her
- States she is consistent with holding everyone accountable and applies same rules to all
- She has placed customers on speaker phone but only while she is multitasking and helping associates at the same time. If a customer is irate and uses profanity she is quick to pick up the headset. When questioned if she has laughed, she says maybe but not at the customer. Advised many have corroborated she has placed these for an entertainment value, she states she does not know why they would say that
- Claims team environment is good and references issues with Nastassia
- Per Jodie's question, admits she is personable with employees but once a DA is administered has "pulled back" and changed her style

Recommendation (the template states Recommendation & Reason):

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 144 of 377 PageID 969

In regards to Cherri Cotton, it was substantiated her ill practice of placing customers on the phone with an intent of mocking them. In our meeting with her, she also admits to changing her style and not being as personal as she is used to when an employee is placed on a disciplinary action. For these behaviors to include the substantiated claims and her failure to uphold our leadership expectations as a manager, I am recommending a Final Written Warning.

During my meeting with Tara, my perception is she was quick to defend Cherri and at one point comments her communication style just like Cherri's has been questioned before. The timeline and emails prove Deidre brought up Cherri's concerns and her incorrect coding, the delay in getting this corrected is questionable. However, she did involve HR in the matter and she handled the follow up with Deidre. My recommendation for her is a strong coaching, emphasizing the objectivity we need to maintain as leaders as well as appropriate timely responses to agent complaints.

Jodie Kelch did follow up immediately with HR upon receiving Deidra's concerns.

Thank you, Yessica



1445 Ross Avenue Suite 2400 Dallas, Texas 75202 www.hallettperrin.com

Monte K. Hurst Board Certified, Labor and Employment Law Texas Board of Legal Specialization direct dial – 214.922.4111 fax – 214.922.4142 monte.hurst@hallettperrin.com

Via e-mail: Gabrielle.Klepper@spielbergerlawgroup.com

February 5, 2016

Ms. Gabrielle Klepper SPIELBERGER LAW GROUP 202 South Hoover Boulevard Tampa, Florida 33609

Re: Our File No.: 39272/40

Reena Mathew vs. Santander Consumer USA Inc.

Dear Ms. Klepper:

Please be advised that this law firm has been retained to represent the interests of Santander Consumer USA Inc. in this matter. As such, please direct all communication with regard to this matter to my office.

We are conducting an investigation with regard to Reena Mathew's allegations and will be reaching back out to you thereafter.

Monte K. Hurst

Should you have any questions, please do not hesitate to contact my office.

Very truly yours,

Monte K. Hurst

MKH:KAB:lb

455096

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 146 of 377 PageID 971

From: "Reena Mathew" </O=D6ORG/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=REENA MATHEW0CB>

To: "Yessica Adriano" < YADRIANO@santanderconsumerusa.com>

Subject: Investigation Summary

Date: Wed, 10 Feb 2016 15:04:25 +0000

Importance: Normal

Hi Yessica,

Please see the summary below for the John Leavell investigation.

Date Complaint Received: 2/4/2016

Investigator: Reena Mathew, HR Business Partner; Witness: Mitzie Jefferson, AVP Servicing

Complainant: John Leavell; Late Stage Account Manager **Accused:** Monisha Hughes-Trigg; Late Stage Account Manager

Witnesses: Erika Boozer, Bianca Mata, Andrew Holcomb, Britney Monte—LS Account Managers on Bill Gray's team

Timeline of Investigation:

2/1/2016: 7pm--Outburst on the floor occurs and John Leavell is heard saying 'shit' loudly by numerous people including the Manager Bill Gray

- Bill Gray issues a coaching and John proceeds to talk loudly on the floor about it
- Bill pulls in fellow manager Robert Terry and John into the Rio Grande to discuss issue
- John curses at Bill including calling him a 'Bitch' and 'Weak' and curses throughout conversation

2/2/2016: Management emails HR later in the afternoon requesting to do a Written based solely upon Bill Gray's statement

2/3/2016: Reena Mathew meets with Mitzie Jefferson/Robert Terry to get the full story (based on Robert's perspective) and that is when we find out the word 'Bitch' was used towards Bill Gray and John Leavell is suspended. John initially voices his concerns in this meeting.

2/4/2016: John Leavell is terminated over the phone and reiterates complaints regarding Bill Gray (not being able to stop panhandling on the team) and issues with Monisha Hughes Trigg constantly panhandling him and asking him for money/debit card etc. and said he would do what he needed to do as that should've been stopped while employed.

Final Incident that led Complainant(s) to complain: On day of suspension, 2/3/16, John brings forth complaints regarding mismanagement of Bill Gray and constant harassing/panhandling by Monisha Hughes Trigg. He stated Monisha kept asking him for money, debit card etc and that is what started the whole thing. Monisha apparently came to him on 2/1/16 and said 'Bitch, give me your debit card' and John said 'No' and Monisha said 'Fuc* you' and John told her 'Fuc* you' and that is what got him in trouble initially. He then stated that he has gone to Bill several times about panhandling and that Bill is scared of Monisha and is the reason why he hasn't addressed the issue with her and it continued to happen.

Confirmed Accusations:

- John Leavell used profanity on the floor (the word 'Shit' was confirmed)
- John Leavell used profanity towards Bill Gray in the meeting in Rio Grande conference room—so loud to where other teams could hear him on the floor (yelling at Bill)
- Issues with Bill Gray's management that have been addressed in the past (allowing team members to all be off at the same time, blowing concerns off, not having sense of urgency)
- John and Monisha constantly went back and forth about John buying Monisha material items (lipo, food, etc) but that they had a rapport where it was joking in nature

Case 3:23-cy-01494-N Document 36 Filed 09/20/24 Page 147 of 377 Bagel D 972 Gray Gray

- Team morale isn't where it needs to be (compared to other teams on the floor)
- John was not being panhandled—he in fact (was told by majority of witnesses) that he would be the one offering team members to go to happy hour, trips to Vegas, had a drawer full of candy and would brag about money he had/won from gambling
- Two people stating that Monisha spoke about investigation after being interviewed (Manager Bill Gray said she came to him with information and email from John Leavell's wife)

Alleged and Unconfirmed Accusations:

- Monisha was panhandling John and said 'Fuc* you' to John
- Bill was aware of panhandling—John stated Bill knew for 6 months; Bill stated he only found out when
 John confronted him in the Rio Grande conference room; AVP Mitzie Jefferson confirmed Bill's
 statement by stating Bill had never come to her with these issues so neither were aware.

Recommendation:

There are two issues here—Monisha is on a Written for insubordination and had another incident (prior to investigation) where she was being disrespectful towards Bill after she came to him with a question (cutting him off/interrupting him and as a side note slapped a female co-worker roughly on the back). We also have breach of confidentiality (re the investigation) per the Manager and the email from John's wife stating that Monisha had contacted John after he had been terminated. Both of these issues would lead to a Final—ongoing behavioral issue and breach of confidentiality. As a result, the business would like to term and my recommendation would also be to term Monisha.

Regarding Bill, both the business and myself would recommend a Verbal for Performance or Inappropriate Mgmt Practices due to the majority of witnesses confirming issues with Bill's managerial skills in addition to numerous Coachings he's already had (similar issues) with AVP Mitzie Jefferson (they've all been documented in EIC).

Let me know if you need any additional information.

Thanks, Reena

Reena Mathew, PHR

Santander Consumer USA Inc. HR Business Partner

PHONE 214.292.2772

MOBILE 214.364.9136

FAX 214.630.0828

EMAIL <u>rmathew@santanderconsumerusa.co</u>m

WEB <u>www.santanderconsumerusa.com</u>

BENEFITS HOTLINE 214.540.2010

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 148 of 377 PageID 973

From: "Reena Mathew" <rmathew@santanderconsumerusa.com>

To: "Yessica Adriano" < YADRIANO@santanderconsumerusa.com>, "Reena Mathew"

<rmathew@santanderconsumerusa.com>

Subject: Conversation with Yessica Adriano **Date:** Mon, 15 Feb 2016 19:31:05 +0000

Importance: Normal

Reena Mathew [9:57 AM]:

HI Yessica, Quick question--do I include the summary template with the term pw? Wasn't sure if that was part of the process now or do we still need to send you our regular template?

Yessica Adriano [10:01 AM]:

you send the regular template and then that one is attached for reference...

pw? sorry my mind is lost

Reena Mathew [10:13 AM]:

Sorry, paperwork is pw.....ok so send over the regular template then for Monisha and the summary template goes into I-Sight, correct?

Reena Mathew [11:37 AM]:

Sorry, did you see my last IM?

Yessica Adriano [11:42 AM]:

sorry didnt catch your IM i had many open, yes please place summary template into isight and send over Monisha regular term template for approval and attach summary for approval, i can further explain tomorrow

but for now did i answer your questions

Reena Mathew [11:44 AM]:

Ok, sounds good--yes that answers it. TY

Reena Mathew [12:14 PM]:

Do you remember what Stephanie referred to as the outburst--verbal altercation in regards to Monisha?

Reena Mathew [12:16 PM]:

Now that I'm thinking about it, it was probably the disrespect issue to Manager Bill.....thoughts?

Yessica Adriano [12:19 PM]:

it depends di he ever tell her to let him finish, or hold on and she kept interrupting if so i would still go with insubordinate behavior to management, and we can prove it was a repetitive event--- the thing with this one is that it will be a combination of things

Reena Mathew [12:33 PM]:

Ok, sounds good!

Reena Mathew [12:53 PM]:

Just responding to your email.......I did, I thought you wanted me to categorize the two (cell phone and outburst) under insubordination (they were Cell phone, Outburst--verbal altercation and Interfering with investigation) I didn't recall what the outburst was but I'm thinking that's the insubordination to Bill......that's what I was asking above:)

Yessica Adriano [1:11 PM]:

ok thanks ill send it to her and see what she says

Reena Mathew [1:12 PM]:

NP-let me know if you need me to add anything

Yessica Adriano [1:12 PM]:

ill add my notes as well when i forward

thanks

Reena Mathew [1:21 PM]:

Sounds good!

Ok if we go ahead and term or do I need to wait for SE's approval?

Yessica Adriano [1:27 PM]:

just sent it off, we need her approval

I should clarify--approval in writing since she already told us we're good. Ok will do

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 150 of 377 PageID 975

From: Stephanie Elad <selad@santanderconsumerusa.com>

To: Reena Mathew <rmathew@santanderconsumerusa.com>

Cc: Yessica Adriano < YADRIANO@santanderconsumerusa.com>

Subject: RE: Term

Date: Tue, 16 Feb 2016 18:52:53 +0000

Importance: Normal

Approved

From: Reena Mathew

Sent: Tuesday, February 16, 2016 12:52 PM

To: Stephanie Elad Cc: Yessica Adriano Subject: FW: Term

Stephanie,

Can you please approve on mine or Yessica's term template so I can attach to term paperwork?

I will save the updated summary in I-Sight.

Thanks! Reena

From: Reena Mathew

Sent: Monday, February 15, 2016 12:43 PM

To: Yessica Adriano **Subject:** Term

Hi Yessica,

Please review for term approval:

Recommendation Details:

- Associate Name: Monisha Hughes Trigg
- Hire Date: 4/7/2014
- DOB(MM/DD Only): 3/31
- DA History:
 - 1/1/2016—Verbal for Performance
 - 12/31/2015—Verbal for Insubordination
 - 12/8/2015—Verbal for Insubordination
 - 11/24/2015—Written for Attendance
 - 11/21/2015—Verbal for Attendance
 - 7/28/2015—Written for Insubordination
 - 7/1/2015—Verbal for Performance
 - 3/4/2015—Final for Attendance
 - 1/9/2015—Written for Attendance
 - 1/8/2015—Verbal for Attendance
 - 12/16/2014—Verbal for Call Model
 - 7/5/2014—Verbal for Attendance

Case/28/2014-0ฟิAtten Nor โคยดูปเทศกาสาสิติ Filed 09/20/24 Page 151 of 377 PageID 976

- Investigation Conducted Y/N (If Yes, attach investigation summary): Y
- · Have we interviewed the associate? Y
- Policy Violation: Violation of Best Practices
- Business Recommendation: Term
- HR Recommendation: Term

Explain briefly why you are making this recommendation (review the considerations below): Associate is on an active Written disciplinary action for Insubordination and has had 2 more infractions (being insubordinate to manager/cell phone usage on floor). Associate was also informed not to share details of investigation in which she interfered by discussing with others. Business and HR recommendation is termination at this time--Brad's approval is attached as well.

Let me know if you need any additional information.

Thanks! Reena

Reena Mathew, PHR

Santander Consumer USA Inc. HR Business Partner

PHONE 214.292.2772

MOBILE 214.364.9136

FAX 214.630.0828

EMAIL <u>rmathew@santanderconsumerusa.co</u>m

WEB <u>www.santanderconsumerusa.com</u>

BENEFITS HOTLINE 214.540.2010

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 152 of 377 PageID 977

From: Stephanie Elad <selad@santanderconsumerusa.com>

To: Reena Mathew <rmathew@santanderconsumerusa.com>

Cc: Yessica Adriano < YADRIANO@santanderconsumerusa.com >

Subject: RE: Investigation Summary

Date: Tue, 16 Feb 2016 17:34:30 +0000

Importance: Normal

Approved

From: Reena Mathew

Sent: Tuesday, February 16, 2016 11:25 AM

To: Stephanie Elad **Cc:** Yessica Adriano

Subject: RE: Investigation Summary

Hi Stephanie,

Please see requested changes below.

Let us know if you need any additional information.

Thanks, Reena

From: Reena Mathew

Sent: Wednesday, February 10, 2016 9:04 AM

To: Yessica Adriano

Subject: Investigation Summary

Hi Yessica,

Please see the summary below for the John Leavell investigation.

Date Complaint Received: 2/4/2016

Investigator: Reena Mathew, HR Business Partner; Witness: Mitzie Jefferson, AVP Servicing

Complainant: John Leavell; Late Stage Account Manager **Accused:** Monisha Hughes-Trigg; Late Stage Account Manager

Witnesses: Erika Boozer, Bianca Mata, Andrew Holcomb, Britney Monte—LS Account Managers on Bill Gray's team

Timeline of Investigation:

2/1/2016: 7pm--Outburst on the floor occurs and John Leavell is heard saying 'shit' loudly by numerous people including the Manager Bill Gray

- Bill Gray issues a coaching and John proceeds to talk loudly on the floor about it
- Bill pulls in fellow manager Robert Terry and John into the Rio Grande to discuss issue
- John curses at Bill including calling him a 'Bitch' and 'Weak' and curses throughout conversation

2/2/2016: Management emails HR later in the afternoon requesting to do a Written based solely upon Bill Gray's statement

2/3/2016: Reena Mathew meets with Mitzie Jefferson/Robert Terry to get the full story (based on Robert's perspective) and that is when we find out the word 'Bitch' was used towards Bill Gray and John Leavell is suspended.

John initiมีผิจจะเชียร์ คิเรียง คิเลียร์ คิเรียง คิเลียร์ คิเลียร์ คิเลียร์ คิเลียร์ คิเลียร์ คิเลียร์ คิเลียร์ คิเลียร์ คิเลียร์ คิเลลา Page 153 of 377 Page 1D 978

2/4/2016: John Leavell is terminated over the phone and reiterates complaints regarding Bill Gray (not being able to stop panhandling on the team) and issues with Monisha Hughes Trigg constantly panhandling him and asking him for money/debit card etc. and said he would do what he needed to do as that should've been stopped while employed.

Final Incident that led Complainant(s) to complain: On day of suspension, 2/3/16, John brings forth complaints regarding mismanagement of Bill Gray and constant harassing/panhandling by Monisha Hughes Trigg. He stated Monisha kept asking him for money, debit card etc and that is what started the whole thing. Monisha apparently came to him on 2/1/16 and said 'Bitch, give me your debit card' and John said 'No' and Monisha said 'Fuc* you' and John told her 'Fuc* you' and that is what got him in trouble initially. He then stated that he has gone to Bill several times about panhandling and that Bill is scared of Monisha and is the reason why he hasn't addressed the issue with her and it continued to happen.

Confirmed Accusations:

- John Leavell used profanity on the floor (the word 'Shit' was confirmed)
- John Leavell used profanity towards Bill Gray in the meeting in Rio Grande conference room—so loud to where other teams could hear him on the floor (yelling at Bill)
- Issues with Bill Gray's management that have been addressed in the past (allowing team members to all be off at the same time, blowing concerns off, not having sense of urgency)
- John and Monisha constantly went back and forth about John buying Monisha material items (lipo, food, etc) but that they had a rapport where it was joking in nature
- Several associates on the team are opinionated and don't always show respect towards Manager Bill Gray
- Team morale isn't where it needs to be (compared to other teams on the floor)
- John was not being panhandled—he in fact (was told by majority of witnesses) that he would be the one offering team members to go to happy hour, trips to Vegas, had a drawer full of candy and would brag about money he had/won from gambling
- Monisha spoke about investigation after being interviewed to her Manager Bill Gray when advised several times by HR re: maintaining investigation's confidentiality

Alleged and Unconfirmed Accusations:

- Monisha was panhandling John and said 'Fuc* you' to John
- Bill was aware of panhandling—John stated Bill knew for 6 months; Bill stated he only found out when John confronted him in the Rio Grande conference room; AVP Mitzie Jefferson confirmed Bill's statement by stating Bill had never come to her with these issues so neither were aware.
- Received letter from John's wife stating Monisha contacted John after investigation took place asking him to change his story re: events that took place

Recommendation:

There are two issues here—Monisha is on a Written for insubordination and had another incident (prior to investigation) where she was being disrespectful towards Bill after she came to him with a question (cutting him off/interrupting him and as a side note slapped a female co-worker roughly on the back). We also have breach of confidentiality (re the investigation) per the Manager and the email from John's wife stating that Monisha had contacted John after he had been terminated. Both of these issues would lead to a Final—ongoing behavioral issue and breach of confidentiality. As a result, the business would like to term and my recommendation would also be to term Monisha.

Regarding Bill, both the business and myself would recommend a Verbal for Performance or Inappropriate Mgmt Practices due to the majority of witnesses confirming issues with Bill's managerial skills in addition to numerous Coachings he's already had (similar issues) with AVP Mitzie Jefferson (they've all been documented in EIC).

Let me know if you need any additional information.

Thanks, Reena

Reena Mathew, PHR

Santander Consumer USA Inc. HR Business Partner

PHONE 214.292.2772

MOBILE 214.364.9136

FAX 214.630.0828

EMAIL <u>rmathew@santanderconsumerusa.co</u>m

WEB <u>www.santanderconsumerusa.com</u>

BENEFITS HOTLINE 214.540.2010

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 155 of 377 PageID 980

From: Yessica Adriano < YADRIANO@santanderconsumerusa.com>

To: Catessa Malone <cnmalone@santanderconsumerusa.com>

Subject: FW: Reena Notes

Date: Mon, 15 Feb 2016 22:10:26 +0000

Importance: Normal

Attachments: Reena Notes 1 of 2.pdf; Reena Notes 2 of 2.pdf

From: Yessica Adriano

Sent: Friday, December 11, 2015 2:05 PM

To: Stephanie Elad **Subject:** Reena Notes

Stephanie,

I finally got the color printer to work and was able to rescan my personal notes of conversations with Reena, since it is in color it is a better read.

Thanks

Yessica Adriano, SPHR, SHRM-SCP

Santander Consumer USA Inc. Manager Human Resources

PHONE 214.722.5667 MOBILE 214.215.5258

EMAIL <u>yadriano@santanderconsumerusa.com</u>
WEB <u>www.santanderconsumerusa.com</u>

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 156 of 377 PageID 981

From: Yessica Adriano < YADRIANO@santanderconsumerusa.com> **To:** Catessa Malone <cnmalone@santanderconsumerusa.com>

Subject: FW: Follow up

Date: Mon, 15 Feb 2016 22:06:55 +0000

Importance: Normal

Feedback provided to Reena

Yessica Adriano, SPHR, SHRM-SCP

Santander Consumer USA Inc. Manager Human Resources

PHONE 214.722.5667 MOBILE 214.215.5258

EMAIL yadriano@santanderconsumerusa.com WEB www.santanderconsumerusa.com

From: Yessica Adriano

Sent: Friday, December 11, 2015 1:14 PM

To: Reena Mathew Subject: Follow up

Hello Reena,

As requested, I will begin recapping our conversations and 1:1s.

Tuesday, December 9, 2015

(Credit Cards) Received a call from Scott and Jeff over concerns on the Deandra case.

To avoid this, please remember to advise the business when we pull anyone from the floor, as it impacts their operations and they need to be accounted for.

When discussing an investigation with the business, do not share any opinions with them until the investigation is completed, we both have discussed, and a final recommendation is crafted, this will eliminate their concerns on us being one sided.

- Discussion over your concerns with the PIP
- Three main categories: attendance/schedule adherence, workload completion, and consulting

Attendance/Work Schedule: No current issues

Workload: Complete time study in 30 minute increments, which will help determine where time is allocated

Consulting: We will partner continuously

Wednesday, December 10, 2015

Review on the Deidre Crouch case, received all of Tara's and Jodie's documentation. It is important we read all documentation carefully to identify employee's concerns, which will allow us to identify questions that need to be asked during an investigation and we ensure parties involved during questioning do not hinder an employees' responses (Tara).

I will ensure we meet today to review the progress on the Time/Study form, so we are both on the same page with that. Please let me know if you have any questions.

Thanks

Yessica AGASE, 3:777 (VSAITAN-45C) Document 36 Filed 09/20/24 Page 157 of 377 PageID 982

Santander Consumer USA Inc. Manager Human Resources

PHONE 214.722.5667 MOBILE 214.215.5258

 EMAIL
 yadriano@santanderconsumerusa.com

 WEB
 www.santanderconsumerusa.com

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 158 of 377 PageID 983

From: Yessica Adriano < YADRIANO@santanderconsumerusa.com> **To:** Catessa Malone < cnmalone@santanderconsumerusa.com>

Subject: FW: Reena

Date: Mon, 15 Feb 2016 22:05:30 +0000

Importance: Normal

Additional info

Yessica Adriano, SPHR, SHRM-SCP

Santander Consumer USA Inc. Manager Human Resources

PHONE 214.722.5667 MOBILE 214.215.5258

 EMAIL
 yadriano@santanderconsumerusa.com

 WEB
 www.santanderconsumerusa.com

From: Yessica Adriano

Sent: Tuesday, December 08, 2015 5:57 PM

To: Stephanie Elad **Subject:** FW: Reena

Hello Steph,

Scott and Jeff both called me this afternoon to express concerns with how Reena has handled this investigation as they feel she is not objective and has delayed resolution. I advised Scott that I would look into the matter. I called Reena afterwards to get a run through of what has occurred and asked her for a summary of this investigation. I did not provide any feedback, I want to review what she has sent and then can address the situation tomorrow (she requested a meeting with me to review her PIP and annual performance).

As a side note, yesterday Jorge Munoz asked if Reena had brought Francisco's matter to my attention. I said, not yet, he was inquiring about his shift differential, stating he had asked Reena several times for the past month to tell me. I told Jorge moving forward he needs to feel comfortable coming to me directly. I did not get further information because an employee I needed to interview was coming into my office.

For tomorrow, I will meet with Jodi and Cherri in the morning and then transition to 8585 in the afternoon to get the Credit Cards issue wrapped up.

Thanks,

Yessica Adriano, SPHR, SHRM-SCP

Santander Consumer USA Inc. Manager Human Resources

PHONE 214.722.5667 MOBILE 214.215.5258

EMAIL <u>yadriano@santanderconsumerusa.com</u>
WEB <u>www.santanderconsumerusa.com</u>

From: Scott Dieckmann

Sent: Tuesday, December 08, 2015 3:18 PM

To: Yessic ลอคล: 23-cv-01494-N Document 36 Filed 09/20/24 Page 159 of 377 PageID 984

Subject: Reena

Yessica,

I wanted to start by saying thank you for taking the time to call me back and listen to my concerns. We have not had Reena as a business partner for very long; however, situations continue to arise that concern me with how things are being handled. Most recently is the ongoing situation with several of my employees and the "bullying" concerns.

Jeff called me today first informing me that we had staff and Judy in HR and had no knowledge of what was happening. I was quite a bit surprised, especially under the circumstances that we would bring Judy into HR for employee issues, when we have discussed her opportunities without informing her leadership team. Typically, where I have worked in the past the leaders would be advised so that we could account for where our staff is at. Furthermore, based on Judy's challenges, I am not sure we want to bring her into this without knowing what is happening or seeing if we are comfortable.

I then got another call from Jeff with numerous concerns, which concern me significantly. Jeff said that he spoke to Reena and that she met with Deandrea to follow up. During their conversation Deandrea again expressed concerns that the situation has not stopped. She said the other girls were still saying things to her under their breath. Jeff asked if she asked the other girls and Reena said yes. Jeff asked what did they say and according to Jeff, Reena said of course they denied it but then went on to say something to the effect of she "Reena" is sure they said it. If Reena was not present and we have no one to substantiate this accusation I don't think HR should be taking sides. We need to ensure we are impartial and make the decisions based on the facts we gather, not our opinion. It comes across as if Reena is emotionally involved and unable to handle this without being partial to Deandrea. If that is the case, she cannot be part of this investigation any longer. Jeff also mentioned that Reena told him part of Deandrea's complaint was around the team luncheon. I believe all three of the girls rode to the lunch with Jeff and either all three or two of the three sat next to each other at lunch while there many open seats to choose from. After the lunch I instructed Jeff to reach out to HR, because he said things went well and didn't see any issues occur. I asked Jeff to ask HR if he should document and provide that because I was concerned that this event would be added to continued complaints. Jeff said he did speak to Reena about it after the lunch. If Deandrea had concerns about the car ride to the lunch or at the lunch itself, why not set that aside and bring Jeff into the conversation so that he could state his perspective and try to help resolve this issue. Also, maybe we should have asked why she chose to ride with Jeff after she found out that Keidra and the other girl she had an issue were riding with him as well. She could have ridden with the other group or taken her own car. Furthermore, maybe ask why sit next to them at lunch if things are bad. Again, this seems like another mis-step in this situation.

Lastly, as soon as Jeff came back from vacation, I believe Keidra met with Jeff and expressed her concerns that Deandrea was on the floor talking to others about the situation. Jeff went on to say that Keidra said Deandrea was telling other staff that she just has to think about her sister (I believe she lost her sister recently) to make herself cry and that she can get them fired. I mentioned this to Tensya prior to us writing everyone up and closing out the issue and was told HR was done and we were not calling anyone else back in. I get the part at some point we need to stop the investigation and at times people may just continue pointing fingers, but in hindsight this issue continues to grow.

Jeff can provide more specifics on this situation and prior situations. The feedback I get from Jeff is many other things have not been handled by her to his expectations. Please let me know if you need anything else from me. I appreciate you intervening to help us work through and hopefully resolve this current situation.

Thank you,

Scott Dieckmann

Santander Consumer USA Inc. SVP Loan Servicing, Consumer Lending

PHONE 214.261.1437

мовіль Саре 2022 cv-01494-N Document 36 Filed 09/20/24 Page 160 of 377 PageID 985

FAX 214.237.0565

EMAIL <u>sdieckmann@santanderconsumerusa.com</u>

WEB www.santanderconsumerusa.com

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 161 of 377 PageID 986

From: Yessica Adriano < YADRIANO@santanderconsumerusa.com> **To:** Catessa Malone < cnmalone@santanderconsumerusa.com>

Subject: Reena FW: Daily Tasks

Date: Mon, 15 Feb 2016 21:28:39 +0000

Importance: Normal

Attachments: 15min assignment 7-2015.xlsx

Catessa,

Attached is the time study she did for Angelina last July.

Angelina mentioned she asked her to do this twice since the first one she received was vague.

Thanks Yessica

From: Angelina Hullum

Sent: Tuesday, December 01, 2015 3:10 PM

To: Yessica Adriano **Subject:** FW: Daily Tasks

I FOUND IT!! here is the second request

From: Reena Mathew

Sent: Wednesday, August 19, 2015 9:44 AM

To: Angelina Hullum **Subject:** Daily Tasks

GM Lina!

Here is my spreadsheet tracking last week.

Let me know if you need anything else.....have a good one!

Thanks, Reena

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 162 of 377 PageID 987

From: Yessica Adriano < YADRIANO@santanderconsumerusa.com>

To: Catessa Malone <cnmalone@santanderconsumerusa.com>

Subject: FW: Reena - Docs

Date: Mon, 15 Feb 2016 17:49:06 +0000

Importance: Normal

Attachments: Reena PIP.doc; Reena 90 Day Action Plan.docx; Time Line of Events.docx

Catessa,

Attached is the PIP and it supporting documents that were delivered and reviewed with Reena.

Please advise if you need further information.

Thank you

From: Yessica Adriano

Sent: Friday, January 15, 2016 3:18 PM

To: Stephen Shaffer Cc: Stephanie Elad Subject: Reena - Docs

Good afternoon,

Attached are the documents that were discussed with Reena this morning.

Thank you

Yessica Adriano, SPHR, SHRM-SCP

Santander Consumer USA Inc. Manager Human Resources

PHONE 214.722.5667 MOBILE 214.215.5258

EMAIL <u>yadriano@santanderconsumerusa.com</u>
WEB <u>www.santanderconsumerusa.com</u>

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 163 of 377 PageID 988

From: Yessica Adriano < YADRIANO@santanderconsumerusa.com>
To: Catessa Malone < cnmalone@santanderconsumerusa.com>

Subject: FW: Reena Meeting Recap 01/15/16 **Date:** Mon, 15 Feb 2016 22:03:41 +0000

Importance: Normal

This is a recap of our meeting where we issued the PIP, Action Plan, and shared Timeline of Events.

Thanks

From: Stephanie Elad

Sent: Monday, January 18, 2016 4:32 PM

To: Yessica Adriano **Cc:** Stephen Shaffer

Subject: RE: Reena Meeting Recap 01/15/16

Thanks for the recap! I think you covered just about everything. I just have a few points to add:

- When you brought up the Google example (for the Associate who was alleged to have falsified her bereavement documentation), I reminded her that I had coached her at the time that I felt that she and Sabrina had spent too much time looking into this issue, and also provided specific direction on how the incident should have been handled. Reena stated that I had provided feedback but that it wasn't coaching. I then explained that if Yessica or I provide direction on how to handle something differently, that is coaching, even if we don't preface the conversation by specifically stating "this is coaching".
- Reena stated that Angelina had been on the HRBP call and had attempted (unsuccessfully) to halt the discussion around the PIP's. When we asked her to explain, she refused. Later that day, I called Angelina and asked her about this. She stated she wasn't on the call and wasn't aware of the content until afterwards, when one of her team members brought it to her attention.
- She asked for examples several times and claimed that she had not been provided with examples thus far.
 However, when Yessica and I shared examples with her, she would argue with them and state that the facts we presented were not true.

From: Yessica Adriano

Sent: Monday, January 18, 2016 11:36 AM

To: Stephanie Elad

Subject: Reena Meeting Recap 01/15/16

Good morning,

I wanted to share with you my summary of our meeting with Reena on Friday, 01/15/2016

We started the meeting by letting her know we had taken her concerns into consideration and taken a step back and reviewed this process. Her annual review was modified for 2015 to a satisfactory rating and she would be receiving her merit and bonus. Our goal was to see her succeed in her role and the PIP and action plan that we were going to discuss were created with that in mind.

She immediately became upset and questioned why she was being placed on two PIPs, it was explained that there isn't two PIPs as the other one was rescinded. The PIP addressed the performance gaps that still existed and it outlined additional concerns that have come to light. We explained the PIP was extended to a 90 day period to give her enough time to make necessary changes. Reena stated we just wanted her out of here and why didn't we just fire her now, and that this was all so unfair.

- Recharged on You have she was being thin as deal legal in since she was never to she was being thin as deal legal in since she was never to she was not be responded with that was feedback and not a coaching session. I provide additional examples and even Stephanie shared an example (google), Reena stated once again these are feedback and not coaching sessions.
- She went on to say on the HRBP call, Susan was talking about PIPs and before anyone can be placed on one they needed to be coached and need to have documentation. Also, Lina was on that call and told Susan to stop talking about PIPs. Stephanie explained we are unaware of what she is talking about, though the PIP is not the last step but first step in addressing and correcting performance.
- Reena also stated she never received the timeline of events. I explained to Reena in our original meeting on 12/01/2015 she wanted examples and I went over each item on the timeline and shared some of the comments she made to them. I reminded her that she had stated she didn't want that (timeline) because Lina and I can easily make up things and put it on paper.
- I proceeded to go over PIP form explaining the columns and performance areas:

Attendance, Reena stated everyone left early she isn't the only one who does it HRBP duties, Reena answered by saying she had been here 5 years she knows how do everything and does not need help. She wanted examples shared the DA timeframes and payroll incident, explained how I needed her to be proactive and resolve these issues as I couldn't guide her with every step, and had to have generalist come in to resolve as I had an urgent matter to attend to Consulting, she accepted the feedback with the D. Crouch investigation and agreed. In regards to the further issues, she wanted names and examples of who made complaints. Advised we do not provide names, provided example how in certain emails she responded to AVPs with "probably" and we need to be clear on responses and shared the concerns from the credit card group. Had discussion on her turnaround time of one DA, Reena stated she had it done within 48 hours. I asked if the task takes 5 minutes why not just deliver it to the business, instead of responding to their 3 emails where they are asking for it. We also advised Reena we have more than one business unit sharing their concerns of how she has handled things and her timeliness. Reena shared an example of a complaint one manager made on another HRBP, she wanted to know what were we doing to them. Explained to her, being in HR she should know we do not discuss other employees matters. In regards to addressing the business for sharing their concerns, she denied it and then admitted to speaking to Jorge and Sam but she was

We went over the action plan and its layout:

just wanting to know if there was any issue

Time Management, went over expectations she was upset of having to submit a time tracking study, stating she doesn't have time for that and why does she have to do it. Advised if she states she is busy, then we need to know where her time is being consumed by. Again, disagreed that she had already done it for Lina and myself and doesn't know why she has to do it again, and I didn't give her feedback on her last one.

After the meeting I went back to my meeting notes with Reena, on December 10, 2015 Reena shared with me what she had written down for her time study for the past couple days. I advised to keep with the 30 minutes increment and advised where she needed to have more detail.

We went over how she would no longer have 8585, so she could focus on her plan and the Lewisville site. Reena became upset and offended, stating she has been here 5 years and knows how to do her job, and her lasting that long says something. We went over the rest of the plan, as I went over additional examples she would respond sarcastically.

Overall, throughout the discussion Reena was extremely defensive, anti-agonistic and at times borderline aggressive. Reena reminded us a few times that she is pregnant. She stated she was never coached, and this was unfair. I advised of how disappointed we were because we listened to her original concerns didn't want to impact her monetarily, that was solved, but the performance still needed to be addressed and corrected. I also mentioned the action plan provides a clear direction and we have even lessened her load and provided additional resources to see her succeed in this plan. Stephanie and I stressed her success depends on her willingness to move forward. Stephanie shared a personal example of a time she received feedback she didn't like, she had to accept it, made changes, and

moved on streets fully keelf was still cose and being an saile that will be the still compared by the following of the still compared by the still compare

Yessica Adriano, SPHR, SHRM-SCP

Santander Consumer USA Inc. Manager Human Resources

PHONE 214.722.5667 MOBILE 214.215.5258

 EMAIL
 yadriano@santanderconsumerusa.com

 WEB
 www.santanderconsumerusa.com

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 166 of 377 PageID 991

RE: _Summary_of_our_conversation_from_last_Wednesday(3);
RE: _Summary_of_our_conversation_from_last_Wednesday(4);
RE: _Summary_of_our_conversation_from_last_Wednesday(5);
Summary_of_our_conversation_from_last_Wednesday; Reminder;
FW: _Last_Chance_to_Register_for_February_Monthly_Luncheon;

RE:_Meeting_you_requested; Meeting_you_requested; RE:_8585_Coverage;

RE:_Update_and_next_steps_regarding_your_issues.; Re:_Following_Up.; RE:_Update;

RE: RM; Draft_-My_review_of_and_recommendations_on_Reena_Mathew_PIP.;

Reena_Mathew; Thank_You; Re:_Touching_base_-_Reena_and_Steve; RE:_Touching_base_-_Reena_and_Steve

I believe this is all of them that apply.

Thank you.

Stephen Shaffer

Santander Consumer USA Inc. VP Human Resources Business Partnership

PHONE 214.722.4580 MOBILE 469.236.5931

 EMAIL
 sshaffer@santanderconsumerusa.com

 WEB
 www.santanderconsumerusa.com

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 167 of 377 PageID 992

From: "Reena Mathew" </O=D6ORG/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=REENA MATHEW0CB>

To: "Yessica Adriano" < YADRIANO@santanderconsumerusa.com>

Subject: Recap

Date: Wed, 17 Feb 2016 23:17:11 +0000

Importance: Normal

Hi Yessica,

Per our conversation, this is what was discussed:

Attendance—I've been giving 48 hour notice; continue to do so with appts etc. I let you know starting next week I will have my appt every 2 weeks.

Time Study—You asked a few questions regarding some of the information. Asked me to quantify how many DA's, specify which investigation and add details ie IM's, door knocks etc. Any trends that we see such as so many corrections from TA or anything else we might notice coming to us. This way we can see where time is being spent (too much/too little) and possibly if something needs to be taken away or given to another team member.

Consulting—We've been meeting prior to investigations and other issues that may arise to discuss game plan. Continue to do so as well as consult with other departments if need be. If there are any changes with deadlines etc, please communicate that.

Thanks, Reena

Reena Mathew, PHR

Santander Consumer USA Inc. HR Business Partner

PHONE 214.292.2772

MOBILE 214.364.9136

FAX 214.630.0828

EMAIL rmathew@santanderconsumerusa.com

WEB www.santanderconsumerusa.com

BENEFITS HOTLINE 214.540.2010

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 168 of 377 PageID 993

Investigation Notes Template

Interviewee: Rosalinda Coronado Case Type: Associate Grievance/Rights

Associate ID: 101478 Case Number: Hire Date: 2/9/2015 Date: 2/18/2016

Dept CC Customer Service Interviewer: Reena Mathew Manager Name: Monika Hinojos Witness/Notes: N/A

Instructions: Prepare for your investigation by identifying the questions that will be asked. Choose all questions/categories that apply. Case types are listed below in order of priority. File your case under the highest priority type regardless of how many types might apply.

Management Concerns:

- 1. How long have you been on team? Four months
- 2. What are the team dynamics like? It's good—I'm improving so I'm going to bonus. I typically keep to myself because I don't want any problems. I sit over on Leevorick 'Dre' Moore's side so I don't have a lot of interaction with others on the team. Monika is always helpful with me. I try to keep myself away from everyone else; all I'm worried about is my job. Where I sit, everything is fine.
- 3. There was an issue that came forward to HR regarding Merits/Pay being discussed amongst team members. What do you know about this? Monika had mentioned in our jump start that some of us were receiving merits but others weren't if you were on a Final or if you hadn't been here long enough. The team was talking about it because some people were upset.
- 4. Did you ever congratulate anyone re: their merit? I did say 'Congrats' to Bonnie on her merit. No one said she had received anything, I just assumed she did because she was smiling and happy and to me she is perfect. I said 'I know you got a bonus and Bonnie said 'Thank you, I did get a bonus. I just don't want problems with anyone.' Rosalinda then proceeded to say 'I'm sorry, I meant it in a good way' and Bonnie said 'I know how others on the team are' Rosalinda said Bonnie didn't want problems with anyone.
- 5. Did you ever hear any teammates speaking in regards to merits? I was in the break room and overheard an associate speaking to Kourtney about an email and merit but I don't know exactly what was said. The other girl said 'Shhh' and that was the end of the conversation.

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 169 of 377 PageID 994

From: Reena Mathew <rmathew@santanderconsumerusa.com>

To: Yessica Adriano < YADRIANO@santanderconsumerusa.com>

Cc: Stephanie Elad < selad@santanderconsumerusa.com>

Subject: RE: Recap

Date: Fri, 19 Feb 2016 19:18:01 +0000

Importance: Normal

HI Yessica,

We did meet for over an hour and you asked for a recap of the meeting and these are the highlights I took away. My understanding of these meetings are to discuss my time study/progress and for me to recap the highlights and this is exactly what we discussed to sum up the meeting.

If I am needing to include all details we discussed, then I need to be clear on that (including questions/answers discussed/my point of view etc as that took up a significant portion).

Please advise.

Thanks, Reena

From: Yessica Adriano

Sent: Friday, February 19, 2016 11:56 AM

To: Reena Mathew Cc: Stephanie Elad Subject: RE: Recap

Reena this summary is not what was requested or expected. We met for over an hour and this summary does not capture the main points of our discussion. Specifically, we reviewed the time study and the Monisha investigation in detail.

The purpose of having you complete this assignment as part of your performance improvement plan is to ensure expectations and feedback are clear. The response below is not a good example of meeting the objective as it relates to this task.

Please review your notes again and add significantly more detail and submit to me no later than Monday, February 22 by 10 am. Let me know if you have any questions.

Thank you,

Yessica Adriano, SPHR, SHRM-SCP

Santander Consumer USA Inc. Manager Human Resources

PHONE 214.722.5667 MOBILE 214.215.5258

EMAIL <u>yadriano@santanderconsumerusa.com</u>
WEB <u>www.santanderconsumerusa.com</u>

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 170 of 377 PageID 995

Sent: Wednesday, February 17, 2016 5:17 PM

To: Yessica Adriano **Subject:** Recap

Hi Yessica,

Per our conversation, this is what was discussed:

Attendance—I've been giving 48 hour notice; continue to do so with appts etc. I let you know starting next week I will have my appt every 2 weeks.

Time Study—You asked a few questions regarding some of the information. Asked me to quantify how many DA's, specify which investigation and add details ie IM's, door knocks etc. Any trends that we see such as so many corrections from TA or anything else we might notice coming to us. This way we can see where time is being spent (too much/too little) and possibly if something needs to be taken away or given to another team member.

Consulting—We've been meeting prior to investigations and other issues that may arise to discuss game plan. Continue to do so as well as consult with other departments if need be. If there are any changes with deadlines etc, please communicate that.

Thanks, Reena

Reena Mathew, PHR

Santander Consumer USA Inc. HR Business Partner

PHONE 214.292.2772

MOBILE 214.364.9136

FAX 214.630.0828

EMAIL rmathew@santanderconsumerusa.com

WEB www.santanderconsumerusa.com

BENEFITS HOTLINE 214.540.2010

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 171 of 377 PageID 996

From: "Reena Mathew" <rmathew@santanderconsumerusa.com>

To: "reenasara@hotmail.com" <reenasara@hotmail.com>

Subject: Fwd: Recap

Date: Fri, 19 Feb 2016 23:54:08 +0000

Importance: Normal

Sent from my iPhone

Begin forwarded message:

From: Reena Mathew < rmathew@santanderconsumerusa.com >

Date: February 19, 2016 at 5:52:22 PM CST

To: Stephanie Elad < <u>selad@santanderconsumerusa.com</u>>

Subject: Re: Recap

Stephanie,

Thanks for the response. I have no trouble recalling what we discussed but just need to know in what detail you all would like for me to summarize.

Again, I sent high level take aways the first time around and didn't receive any feedback regarding details so that is what I did this time around as well. I would like to be successful as well but need clearer direction than what I'm receiving (esp since I seem to be receiving it after the fact). I think it's very one sided as there are unspoken expectations for me but when I ask for help or clarity, I get penalized for what I do as if I don't understand what's being asked of me.

Stephanie, I'm a UT Austin graduate and hold a Masters degree with my PHR so grasping concepts is not an issue for me.

As I've stated before, direction and expectations have been minimal and I get criticized for things I don't do when I have no or minimal knowledge of them. If I'm truly to be successful, it needs to be synergistic and Yessica and I have been consulting as needed and seem to be moving forward. It was disheartening then to be emailed the original email from this afternoon and take ten steps back. I am committed to my job but need to have faith in my management as well.

I have sent the revised recap and will include specific details of conversations going forward. I look forward to reading yours and Yessica's feedback.

Thanks, Reena

Sent from my iPhone

On Feb 19, 2016, at 4:35 PM, Stephanie Elad <<u>selad@santanderconsumerusa.com</u>> wrote:

Reena, Gase to say that the sance with 36 yes iled when welding pour etas. It shot very wellined? I can't speak to last week because I wasn't present for that conversation, but since I was present for this week's conversation, I can say that this summary didn't meet what I expected. We had an in depth discussion around the Monisha investigation and both Yessica and I provided specific feedback, direction and coaching. It concerns me that you didn't include that in your recap. And, there were other issues that we discussed in depth as well.

As I have stated previously on several occasions, the purpose of the performance improvement plan (and process) is to help you get to a place where you are meeting expectations. You have stated numerous times that you know your job and that the issue is workload, and not skill set. However, this recap would indicate otherwise, as you are either not able to identify the key concepts and coaching opportunities that were provided to you during the discussion this past Wednesday, or are not able to communicate them effectively. Either way, this is a cause for concern.

I have to tell you that I'm at a bit of a loss at this point. You have been offered opportunities for development and you have not, to my knowledge, requested any assistance in this regard. Also, I noticed that you didn't take many notes during the meeting, which might have helped in terms of formulating your recap. Both Yessica and I are committed to helping you be successful, and we need your partnership.

The reason for asking you to provide a recap is to ensure that you are understanding the direction and feedback. This is an important exercise to ensure comprehension. If these were your only key take-aways, then there is a definite disconnect. And, it is not Yessica's job, or mine, to recap the meeting for you. Our job is to provide the feedback, yours is to digest it and act up on it.

I am happy to discuss further if you wish next week. However, please do not take this to mean that there is an extension to the deadline that Yessica set for Monday at 10:00am.

Thanks! Stephanie

From: Reena Mathew

Sent: Friday, February 19, 2016 2:03 PM

To: Stephanie Elad **Subject:** FW: Recap

Stephanie,

This is yet another example of poor direction/expectations where I'm asked to do something, I do it, and then it's wrong without proper clarification. If my Manger is wanting exact details, then she will need to make that very clear. I sent the same type of recap the first time (please see attached) and it was fine.

I am not a mind reader and if I'm not told exactly what a person is wanting until after the fact, that is unfair to me. This reminds me of the whole review process all over again and I refuse to go down that path for a second time.

Please help us clear this miscommunication up as it is affecting me time and time again and being pregnant, I cannot walk on egg shells wondering if what I'm doing is going to come back with a different set of expectations.

Thanks, Reena

From: Yessica Adriano

Sent: Friday, February 19, 2016 11:56 AM

To: Reena Mathew

Cc: Stephane 2:23-cv-01494-N Document 36 Filed 09/20/24 Page 173 of 377 PageID 998

Subject: RE: Recap

Reena this summary is not what was requested or expected. We met for over an hour and this summary does not capture the main points of our discussion. Specifically, we reviewed the time study and the Monisha investigation in detail.

The purpose of having you complete this assignment as part of your performance improvement plan is to ensure expectations and feedback are clear. The response below is not a good example of meeting the objective as it relates to this task.

Please review your notes again and add significantly more detail and submit to me no later than Monday, February 22 by 10 am. Let me know if you have any questions.

Thank you,

Yessica Adriano, SPHR, SHRM-SCP

Santander Consumer USA Inc. Manager Human Resources

PHONE 214.722.5667 MOBILE 214.215.5258

 EMAIL
 yadriano@santanderconsumerusa.com

 WEB
 www.santanderconsumerusa.com

From: Reena Mathew

Sent: Wednesday, February 17, 2016 5:17 PM

To: Yessica Adriano **Subject:** Recap

Hi Yessica,

Per our conversation, this is what was discussed:

Attendance—I've been giving 48 hour notice; continue to do so with appts etc. I let you know starting next week I will have my appt every 2 weeks.

Time Study—You asked a few questions regarding some of the information. Asked me to quantify how many DA's, specify which investigation and add details ie IM's, door knocks etc. Any trends that we see such as so many corrections from TA or anything else we might notice coming to us. This way we can see where time is being spent (too much/too little) and possibly if something needs to be taken away or given to another team member.

Consulting—We've been meeting prior to investigations and other issues that may arise to discuss game plan. Continue to do so as well as consult with other departments if need be. If there are any changes with deadlines etc, please communicate that.

Thanks, Reena

Reena Mathew, PHR

Santander Consumer USA Inc. HR Business Partner PHONE Case 23:227 CV-01494-N Document 36 Filed 09/20/24 Page 174 of 377 PageID 999

MOBILE 214.364.9136 FAX 214.630.0828

EMAIL rmathew@santanderconsumerusa.com
WEB www.santanderconsumerusa.com

BENEFITS HOTLINE 214.540.2010

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 175 of 377 PageID 1000

From: "Reena Mathew" </O=D6ORG/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=REENA MATHEW0CB>

To: "Yessica Adriano" < YADRIANO@santanderconsumerusa.com>

Cc: "Stephanie Elad" < selad@santanderconsumerusa.com>

Subject: RE: Recap

Date: Mon, 22 Feb 2016 22:05:56 +0000

Importance: Normal

Sounds good—per our conversation, the only question I had was about the item in red.

Thanks, Reena

From: Yessica Adriano

Sent: Monday, February 22, 2016 2:54 PM

To: Reena Mathew Cc: Stephanie Elad Subject: Recap

Reena,

Thank you for the revised recap. The second version is closer to what I was looking for. Please see my responses (in blue) below. I recommend that you over-communicate going forward, rather than try to be brief. A specific, exact recap is what is required.

Also, my understanding is that you received feedback from Stephen that your summary to him after your meeting was neither timely nor specific. I would expect you to extrapolate that the same is required for your recaps of our meetings.

To ensure clear understanding on your part of the direction and requirements being provided to you, here is a list of what is expected:

- Provide a complete and exact summary of the key points and key sub-points of the meeting, as well as clarification and summary of your understanding of these points.
- The summary must be provided within 48 hours of the meeting, unless I have approved otherwise, prior to the deadline.
- You will receive a response within 48 hours of submitting your summary to me.
- 48 hours refers to business days only (and does not include holidays, weekend days, vacation days, etc.)
- Failure to demonstrate the capability or desire to complete this task will be taken into account regarding your overall performance and success on your improvement plan.
- Feel free to request feedback prior to submission, but it is my expectation that you are able to execute this
 assigned task independently throughout your improvement period.

As you will see, I have copied and pasted your second draft of the summary below. I have deleted the rest of the email chain, for simplicity purposes.

From: Reena Mathew

Sent: Wednesday, February 17, 2016 5:17 PM

To: Yessica Adriano **Subject:** Recap

Per our conversation, this is what was discussed:

Attendance—I've been giving 48 hour notice; continue to do so with appts etc. I let you know starting next week I will have my appt every 2 weeks.

Agreed.

Time Study—You asked a few questions regarding some of the information on the time study. Specifically you asked for names of investigations, summary recap (what that entailed doing, I mentioned there are interruptions in between and that included typing notes), quantifying DA's so we know how many are being received (add a number so we know what's being received/completed per week). Also, add details ie IM's, door knocks etc. Any trends that we see such as so many corrections from TA or anything else we might notice coming to us that may not be ours to resolve. This way we can see where time is being spent (too much/too little) and possibly if something needs to be taken away or given to another team member/department.

Yes we did discuss areas in the time study and asked for clarity and specifics.

Also, in our discussion you mentioned that the time study was more time consuming than beneficial. The purpose of this assignment is to help you be more efficient with your time, which involves first understanding where time is spent, and then determining areas for improvement. As you stated that you do not see value to improve your performance by utilizing this tool you may cease from continuing. My response: I see value if you all would like me to do this, however, it is very time consuming and it is hard to quantify every detail since there is usually more than one thing going on at one time. I'm good with giving a count of DA's/Investigations per week per our conversation this afternoon. However, you will still be held accountable for your decisions regarding where you spend your time and ensuring your workload is completed. I will only ask that you send me on a weekly basis the number of DA's handled and investigations led. This is due by 5:00pm each Friday.

Consulting—We've been meeting prior to investigations and other issues that may arise to discuss game plan. Continue to do so as well as consult with other departments if need be. We spoke about the Monisha investigation and talked about how the business perceives us and if there are any changes (to deadlines set) to communicate that. We (myself and the business) had to meet with Monisha one more time after the three of us met Friday afternoon and we had to modify the summary. If that occurs, communicate to mgmt. so if they were expecting it a little earlier, everyone would be on the same page re: status. Also update summary accordingly after we speak about it (ie wife's email had to be added to unconfirmed allegations). I also mentioned that if there are things expected of me, it needs to be clear. I mentioned I read my review and there was information regarding a DA report that I had no knowledge of and that it said I was entering less DA's than others. I said that is unfair to me to be measured on something like that without knowing that's an expectation. You all stated that's something we all need to help with and I said I would be more than willing to assist but sometimes the workload is physically impossible for one person. Stephanie mentioned HR Generalist was out for some time and there were DA's left on the desk when they returned and bonus has been missed in the past. I mentioned if the Generalist is out for a week, we may need backup because that is a lot for one person to cover. I asked when is it ok to ask Manager for help and she said I could ask but I would need to be able to quantify what I was doing.

I also stated that it's hard to quantify what I do because it's always more than one task at a time but I would do what I was asked of.

We have met prior to each investigation and decided upon action plans, this has worked out well, let's continue.

Your summary above briefly mentions the Monisha incident, but we want to be sure the message was clear. On Friday, February 12th the three of us (Stephanie, you and myself) met to discuss the Monisha case. During this discussion, Stephanie specifically coached you on how to compose the summary and term approval request and which information to exclude (John's wife email). In addition, Stephanie requested this task be completed first thing on Monday morning, yet at noon on Monday she emailed me asking for the information. When this was sent to her it still included the information she asked to be removed. As discussed, it is important that we follow up in a timely manner and if a delay is unavoidable, please be proactive in the communication of that as well as ensuring our work is precise. Also, Stephanie specifically told you that this delay on your part, led to the term being delayed by one day, which impacts

the businessen 3: 23: Fy-D-2-94-0-Nof Processing 36: tte-iged 29/2-0/2-4shi Page 0, 7t7 and w2-7 this egg lby-2-02-work for us, and be paid, an additional day.

Finally we discussed the administrative tasks of the HR inbox and how the expectation is we all work together through that, it is understood the HR Generalist will primarily handle these responsibilities, however we need to assist as well.

Thanks, Reena

Reena Mathew, PHR

Santander Consumer USA Inc. HR Business Partner

PHONE 214.292.2772

MOBILE 214.364.9136

FAX 214.630.0828

EMAIL <u>rmathew@santanderconsumerusa.co</u>m

WEB <u>www.santanderconsumerusa.com</u>

BENEFITS HOTLINE 214.540.2010

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 178 of 377 PageID 1003

From: Yessica Adriano < YADRIANO@santanderconsumerusa.com> **To:** Catessa Malone < cnmalone@santanderconsumerusa.com>

Subject: RE: Reena 90 Day Action Plan **Date:** Wed, 24 Feb 2016 15:54:36 +0000

Importance: Normal

Yes please, that way if they have any revisions I can incorporate.

Thanks

From: Catessa Malone

Sent: Wednesday, February 24, 2016 9:53 AM

To: Yessica Adriano

Subject: RE: Reena 90 Day Action Plan

Would you like for our outside counsel to review this?

From: Yessica Adriano

Sent: Tuesday, February 23, 2016 6:27 PM

To: Catessa Malone

Subject: Reena 90 Day Action Plan

Catessa,

Attached is Reena's 90 day action plan, at the end of the document I have added a formal 30 day review that highlights the points that I will be discussing with her this Friday, February 26 at 2 pm. I will be also providing a hard copy of this to her.

May you please have this document reviewed and any feedback needed sent back to me no later than noon on Friday.

Thank you,

Yessica Adriano, SPHR, SHRM-SCP

Santander Consumer USA Inc. Manager Human Resources

PHONE 214.722.5667 MOBILE 214.215.5258

EMAIL <u>yadriano@santanderconsumerusa.com</u>
WEB <u>www.santanderconsumerusa.com</u>

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 179 of 377 PageID 1004

From: Holly Hanes hhanes@santanderconsumerusa.com

To: Yessica Adriano < YADRIANO@santanderconsumerusa.com>

Subject: RE: Reena 90 Day Action Plan **Date:** Thu, 25 Feb 2016 16:40:24 +0000

Importance: Normal

Great. I will be scheduling it for 2pm. I'll send an invite shortly.

Thank you,

Holly Hanes

Santander Consumer USA Inc. HR Operational Analyst III

PHONE 972.761.1039 FAX 972.759.5330

EMAIL <u>hhanes@santanderconsumerusa.com</u>
WEB <u>www.santanderconsumerusa.com</u>

From: Yessica Adriano

Sent: Wednesday, February 24, 2016 2:59 PM

To: Holly Hanes **Cc:** Catessa Malone

Subject: RE: Reena 90 Day Action Plan

Anytime between 1-3 pm is good.

Thanks

Yessica Adriano, SPHR, SHRM-SCP

Santander Consumer USA Inc. Manager Human Resources

PHONE 214.722.5667 MOBILE 214.215.5258

EMAIL <u>yadriano@santanderconsumerusa.com</u>
WEB <u>www.santanderconsumerusa.com</u>

From: Holly Hanes

Sent: Wednesday, February 24, 2016 2:39 PM

To: Yessica Adriano **Cc:** Catessa Malone

Subject: RE: Reena 90 Day Action Plan

Hi Yessica,

Catessa is handing over the responsibilities related to Associate legal dealings back to me. What is your availability tomorrow afternoon to discuss the below info with the attorney?

Thank you,

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 180 of 377 PageID 1005

Holly Hanes

Santander Consumer USA Inc. HR Operational Analyst III

PHONE 972.761.1039 FAX 972.759.5330

EMAIL <u>hhanes@santanderconsumerusa.com</u>
WEB <u>www.santanderconsumerusa.com</u>

From: Yessica Adriano

Sent: Tuesday, February 23, 2016 6:27 PM

To: Catessa Malone

Subject: Reena 90 Day Action Plan

Catessa,

Attached is Reena's 90 day action plan, at the end of the document I have added a formal 30 day review that highlights the points that I will be discussing with her this Friday, February 26 at 2 pm. I will be also providing a hard copy of this to her.

May you please have this document reviewed and any feedback needed sent back to me no later than noon on Friday.

Thank you,

Yessica Adriano, SPHR, SHRM-SCP

Santander Consumer USA Inc. Manager Human Resources

PHONE 214.722.5667 MOBILE 214.215.5258

EMAIL <u>yadriano@santanderconsumerusa.com</u>
WEB <u>www.santanderconsumerusa.com</u>

This e-mail is covered by the Electronic Communications Privacy Act, 18 U.S.C. Sections 2510-2521. The information contained in this e-mail is confidential and intended only for use of the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this message in error or there are any problems please notify the originator immediately.

The unauthorized use, disclosure, copying or alteration of this message is strictly forbidden. This mail and any attachments have been scanned for viruses prior to leaving sender's company network. Neither the sender nor the sender's company will be liable for direct, special, indirect or consequential damages arising from alteration of the contents of this message by a third party or as a result of any virus being passed on.

Sender's company accepts no liability for the content of this email or its attachments, or for the consequences of any actions taken on the basis of the information provided, unless that information is subsequently confirmed in writing.

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 181 of 377 PageID 1006

From: Yessica Adriano < YADRIANO@santanderconsumerusa.com>

To: Stephanie Elad <selad@santanderconsumerusa.com>

Subject: Fwd: Revised

Date: Fri, 26 Feb 2016 13:10:34 +0000

Importance: Normal

FYI

Begin forwarded message:

From: Holly Hanes < hanes@santanderconsumerusa.com >

Date: February 26, 2016 at 7:08:10 AM CST

To: Yessica Adriano < <u>YADRIANO@santanderconsumerusa.com</u>>

Subject: RE: Revised

Thank you for the information!

I will forward it on to the attorneys.

Yes, I'm sure it will be fine to include Stephanie. I will add her to the invite.

Thank you,

Holly Hanes

Santander Consumer USA Inc. HR Operational Analyst III

PHONE 972.761.1039 FAX 972.759.5330

EMAIL <u>hhanes@santanderconsumerusa.com</u>
WEB <u>www.santanderconsumerusa.com</u>

From: Yessica Adriano

Sent: Friday, February 26, 2016 7:06 AM

To: Holly Hanes **Subject:** Revised

Good morning Holly,

I added another example to highlight the lack of detail in the work provided (time study).

There is also another example that occurred when she met with Stephen Schaffer, where she didnt meet a deadline and did not fulfill the task as requested. Although the example proves our point, it was during a time she was bringing forth a concern, so it might not be a good idea for us to include that.

Also, Holly is it possible for Stephanie to be part of our meetings with the legal group moving forward, she has been a part of my recap discussions with Reena and can provide further insight.

Thanks Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 182 of 377 PageID 1007

Yessica Adriano, SPHR, SHRM-SCP

Santander Consumer USA Inc. Manager Human Resources

PHONE 214.722.5667 MOBILE 214.215.5258

 EMAIL
 yadriano@santanderconsumerusa.com

 WEB
 www.santanderconsumerusa.com



30 Day Review February 26, 2016

<u>Follow up Meetings Conducted</u> Friday, January 29, 2016 Wednesday, February 17, 2016

Attendance

You have been consistent in providing an appropriate notice for requested time off and have worked additional hours to offset the time you have left early/came in late. There have been no issues with attendance, please continue with the same course of notifications and arranging your schedule as needed in order to complete work as required.

Time Management and Effective Work Habits

You completed two weeks' worth of the Time Study, we reviewed these documents and asked for more specifics in certain areas. We explained the purpose of this assignment was to help you be more efficient with your time through understanding where time is spent. However, upon listening to your feedback and thoughts of how you felt this exercise consumed too much time and was not beneficial, we provided you the option to cease from continuing. As previously discussed, you will still be held accountable for your decisions regarding where your time is spent and ensuring work load is complete. Instead, we have asked that you provide on a weekly basis (every Friday by 5 pm) a count of the number of DA's handles and investigations led.

In addition, we have discussed how the administrative tasks (HR inbox) are a team effort, although these are primarily handled by our HR Generalist, we all need to assist.

Time Management and Effective Work Habits continue to be an opportunity, here are a few examples:

- The summary recap that you provided on Wednesday, February 17 was sent back due to the lack of detail. When providing a summary of our follow up meetings please ensure you are thorough and provide all key points and sub points that are discussed as well as a summary of your understanding. This is done to ensure feedback we deliver is clear and is mutually understood. These will continue to be due within 48 business hours of our meeting, unless otherwise advised. In addition, feedback was provided in areas of the Time Study for lacking necessary details to justify the time spent (DA administration, amount of time spent on investigation). As mentioned, it is important that you are thorough and provide sufficient detail with any task submitted.
- We discussed and an example where your work/response was not provided on a timely manner. Stephanie had requested a term request to include the investigation summary, this was not turned by the time allotted. We explained the importance of meeting deadlines, however if an issue arises to where this cannot be met, it is essential you proactively communicate the delay with a new ETA.

Consulting

We met and reviewed the investigation process in depth, I provided examples of expectations, and reviewed required documentation. During these past 30 days, you have lead four investigations each of which we have discussed and agreed upon course of actions to take- this has worked out well, and we will continue this strategy.

SC Action Plan

Revised 01/2016



We did address being precise in the summary's submitted after discussions. We reviewed the case of Monisha, where our HR Director coached you on the approach to take and what information to eliminate (Johns wife's email). This summary was submitted late and it still included the information that she had advised to remove. To avoid this in the future, we ask that you take notes during coaching sessions to capture important points and actions.

Note: I reminded you during our two follow up sessions of the resources available for you (ie: shadowing other HRBPs, additional training, etc.) as aligned in our action plan, and you have declined these options. However, we are invested in ensuring you have the feedback, the coaching, or tools to help you improve. If you have suggestions as to experiences, tools, or development activities that would assist you, please make us aware of these. Obviously, there are some limitations from a financial perspective and time requirements, but we are open to considering any proposal you may have.

Attached please find the summaries of our two follow up meetings for additional specifics and detail around the feedback and coaching provided to you regarding your performance.

We continue to be fully committed to your success against this action plan, please review and let us know if you have any questions.

Associate Signature

Manager Signature

Acknowledgement of vicein only

Discussion Date

Director Signature



Follow Up Emails from January 29, 2016 Discussion

From: Yessica Adriano

Sent: Tuesday, February 02, 2016 4:49 PM

To: Reena Mathew

Subject: RE: Summary of Meeting

Hello Reena.

Thank you for providing the summary. I have added my additional notes in blue.

We will have our next follow up meeting on Friday, February 12th. If you have any questions on the action items before then, please do not hesitate to ask.

Thanks, Yessica

From: Reena Mathew

Sent: Monday, February 01, 2016 12:24 PM

To: Yessica Adriano

Subject: Summary of Meeting

Hi Yessica,

Per our conversation on Friday, 1/29/16, here is what we discussed:

Attendance—I've been giving 48 hour notice as well as placing time off in calendar; no issues-continue to do so.

Agreed.

Time Management—Work study every 30 minutes due every Friday. We will meet every other Friday (pay day Fridays) to discuss/debrief progress etc. Asked if I would like to attend any type of classes to assist; said if I came across anything would let Manager know.

Agreed. In addition, please advise of any courses or TM departments you would like to work with no later than 02/05, as highlighted in the action plan.

Whenever a deadline is assigned by upper management or anyone, it is important to respond timely. If you are unable to complete within the time assessed, then it is necessary to provide an update or explanation of what occurred with a new ETA.

Consulting—No issues at this time; would like for me to take over the investigation for Ireshia Brown—in charge of summaries, aftermath; you would like for me to respond timely to all issues/requests etc and let you know if I have any questions. Start fresh with January.

Yes, you are taking lead on the Ireshia Brown investigation from beginning to end. Please brief me with your plan of action and we will review your summaries once completed to ensure we are on the same page.

Just as a side note, we also discussed my perspective on things and how PIP had been handled in my case.

SC Action Plan

Revised 01/2016



We revisited your viewpoint on the matter and discussed some discrepancies you felt were in the timeline, and I shared my examples and thoughts on it. Ultimately this stands and we agreed disagree, our focus will be to work towards completing the action plan successfully.

Let me know if you need anything else.

Thanks,

Reena

Reena Mathew, PHR

Santander Consumer USA Inc. HR Business Partner

PHONE

214.292.2772

MOBILE 214.364.9136

FAX

214.630.0828

rmathew@santanderconsumerusa.com

www.santanderconsumerusa.com



Follow Up Emails from February 17, 2016 Discussion

From: Yessica Adriano

Sent: Monday, February 22, 2016 2:54 PM

To: Reena Mathew Cc: Stephanie Elad Subject: Recap

Reena,

Thank you for the revised recap. The second version is closer to what I was looking for. Please see my responses (in blue) below. I recommend that you over-communicate going forward, rather than try to be brief. A specific, exact recap is what is required.

Also, my understanding is that you received feedback from Stephen that your summary to him after your meeting was neither timely nor specific. I would expect you to extrapolate that the same is required for your recaps of our meetings.

To ensure clear understanding on your part of the direction and requirements being provided to you, here is a list of what is expected:

- Provide a complete and exact summary of the key points and key sub-points of the meeting, as well as clarification and summary of your understanding of these points.
- The summary must be provided within 48 hours of the meeting, unless I have approved otherwise, prior to the deadline.
- You will receive a response within 48 hours of submitting your summary to me.
- 48 hours refers to business days only (and does not include holidays, weekend days, vacation days, etc.)
- Failure to demonstrate the capability or desire to complete this task will be taken into account regarding your overall performance and success on your improvement plan.
- Feel free to request feedback prior to submission, but it is my expectation that you are able to execute this
 assigned task independently throughout your improvement period.

As you will see, I have copied and pasted your second draft of the summary below. I have deleted the rest of the email chain, for simplicity purposes.

From: Reena Mathew

Sent: Wednesday, February 17, 2016 5:17 PM

To: Yessica Adriano **Subject:** Recap

Hi Yessica,

Per our conversation, this is what was discussed:

Attendance—I've been giving 48 hour notice; continue to do so with appts etc. I let you know starting next week I will have my appt every 2 weeks.

Agreed.

Time Study—You asked a few questions regarding some of the information on the time study. Specifically you asked for names of investigations, summary recap (what that entailed doing, I mentioned there are interruptions in between and that included typing notes), quantifying DA's so we know how many are being received (add a number so we know what's being received/completed per week). Also, add details ie IM's, door

SC Action Plan

Revised 01/2016



knocks etc. Any trends that we see such as so many corrections from TA or anything else we might notice coming to us that may not be ours to resolve. This way we can see where time is being spent (too much/too little) and possibly if something needs to be taken away or given to another team member/department.

Yes we did discuss areas in the time study and asked for clarity and specifics.

Also, in our discussion you mentioned that the time study was more time consuming than beneficial. The purpose of this assignment is to help you be more efficient with your time, which involves first understanding where time is spent, and then determining areas for improvement. As you stated that you do not see value to improve your performance by utilizing this tool you may cease from continuing. However, you will still be held accountable for your decisions regarding where you spend your time and ensuring your workload is completed. I will only ask that you send me on a weekly basis the number of DA's handled and investigations led. This is due by 5:00pm each Friday.

Consulting—We've been meeting prior to investigations and other issues that may arise to discuss game plan. Continue to do so as well as consult with other departments if need be. We spoke about the Monisha investigation and talked about how the business perceives us and if there are any changes (to deadlines set) to communicate that. We (myself and the business) had to meet with Monisha one more time after the three of us met Friday afternoon and we had to modify the summary. If that occurs, communicate to mgmt. so if they were expecting it a little earlier, everyone would be on the same page re: status. Also update summary accordingly after we speak about it (ie wife's email had to be added to unconfirmed allegations). I also mentioned that if there are things expected of me, it needs to be clear. I mentioned I read my review and there was information regarding a DA report that I had no knowledge of and that it said I was entering less DA's than others. I said that is unfair to me to be measured on something like that without knowing that's an expectation. You all stated that's something we all need to help with and I said I would be more than willing to assist but sometimes the workload is physically impossible for one person. Stephanie mentioned HR Generalist was out for some time and there were DA's left on the desk when they returned and bonus has been missed in the past. I mentioned if the Generalist is out for a week, we may need backup because that is a lot for one person to cover. I asked when is it ok to ask Manager for help and she said I could ask but I would need to be able to quantify what I was doing.

I also stated that it's hard to quantify what I do because it's always more than one task at a time but I would do what I was asked of. We have met prior to each investigation and decided upon action plans, this has worked out well, let's continue.

Your summary above briefly mentions the Monisha incident, but we want to be sure the message was clear. On Friday, February 12th the three of us (Stephanie, you and myself) met to discuss the Monisha case. During this discussion, Stephanie specifically coached you on how to compose the summary and term approval request and which information to exclude (John's wife email). In addition, Stephanie requested this task be completed first thing on Monday morning, yet at noon on Monday she emailed me asking for the information. When this was sent to her it still included the information she asked to be removed. As discussed, it is important that we follow up in a timely manner and if a delay is unavoidable, please be proactive in the communication of that as well as ensuring our work is precise. Also, Stephanie specifically told you that this delay on your part, led to the term being delayed by one day, which impacts the business and their perception of HR resolving matters in a timely fashion. Also, it allowed this employee to work for us, and be paid, an additional day.

Finally we discussed the administrative tasks of the HR inbox and how the expectation is we all work together through that, it is understood the HR Generalist will primarily handle these responsibilities, however we need to assist as well.

Thanks, Reena

SC Action Plan

Revised 01/2016



From: Yessica Adriano

Sent: Friday, February 19, 2016 4:20 PM

To: Reena Mathew Cc: Stephanie Elad Subject: RE: Recap

Hi Reena,

Thank you for the response and the opportunity to clarify. I am looking for a more in depth recap of key take aways and specific directive. Again, this is to ensure understanding of the expectations on your part. As it relates to our discussion on Wednesday, I would have expected a recap of the coaching that both Stephanie and I provided regarding the timeliness and following instruction as to the Monisha investigation. As I'm sure you recall, Stephanie and I both provided feedback to you on that situation. Specifically, please recap the exact feedback that I provided regarding this investigation as well as the statements that Stephanie made in regards to the delay. I'm not looking for a recap of the investigation, but rather the specific discussion the three of us had.

Also, although you did provide a statement in your recap about my request to quantify how many DAs are completed each week we also discussed listing the number of investigations, ensuring you are assisting with administrative tasks, and your process for intakes when it comes to DAs. There are more items that we covered other than what I have listed in this paragraph, however I am looking to you to provide this information and then I will add feedback and clarify as needed.

One of the items on the Performance Improvement Plan addressed requested work being incomplete. A summary of the meeting does not need to include every single detail, however it should include key points and takeaways. I do not think this recap met that expectation. I hope this answers your question, please let me know if you need further clarification

Thank you, Yessica

From: Reena Mathew

Sent: Friday, February 19, 2016 1:18 PM

To: Yessica Adriano Cc: Stephanie Elad Subject: RE: Recap

HI Yessica,

We did meet for over an hour and you asked for a recap of the meeting and these are the highlights I took away. My understanding of these meetings are to discuss my time study/progress and for me to recap the highlights and this is exactly what we discussed to sum up the meeting.

If I am needing to include all details we discussed, then I need to be clear on that (including questions/answers discussed/my point of view etc as that took up a significant portion).

Please advise.

Thanks,



From: Yessica Adriano

Sent: Friday, February 19, 2016 11:56 AM

To: Reena Mathew Cc: Stephanie Elad Subject: RE: Recap

Reena this summary is not what was requested or expected. We met for over an hour and this summary does not capture the main points of our discussion. Specifically, we reviewed the time study and the Monisha investigation in detail.

The purpose of having you complete this assignment as part of your performance improvement plan is to ensure expectations and feedback are clear. The response below is not a good example of meeting the objective as it relates to this task.

Please review your notes again and add significantly more detail and submit to me no later than Monday, February 22 by 10 am. Let me know if you have any questions.

Thank you,

Yessica Adriano, SPHR, SHRM-SCP

Santander Consumer USA Inc. Manager Human Resources

PHONE 214.722.5667 MOBILE 214.215.5258

WEB www.santanderconsumerusa.com

From: Reena Mathew

Sent: Wednesday, February 17, 2016 5:17 PM

To: Yessica Adriano
Subject: Recap

Hi Yessica,

Per our conversation, this is what was discussed:

Attendance—I've been giving 48 hour notice; continue to do so with appts etc. I let you know starting next week I will have my appt every 2 weeks.

Time Study—You asked a few questions regarding some of the information. Asked me to quantify how many DA's, specify which investigation and add details ie IM's, door knocks etc. Any trends that we see such as so many corrections from TA or anything else we might notice coming to us. This way we can see where time is being spent (too much/too little) and possibly if something needs to be taken away or given to another team member.

Consulting—We've been meeting prior to investigations and other issues that may arise to discuss game plan. Continue to do so as well as consult with other departments if need be. If there are any changes with deadlines etc, please communicate that.

Thanks.

SC Action Plan

Revised 01/2016



Reena

Reena Mathew, PHR

Santander Consumer USA Inc. HR Business Partner

PHONE 214.292.2772

MOBILE 214.364.9136

FAX 214.630.0828

 EMAIL
 rmathew@santanderconsumerusa.com

 WEB
 www.santanderconsumerusa.com

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 192 of 377 PageID 1017

From: Yessica Adriano < YADRIANO@santanderconsumerusa.com>

To: Sabrina Boyd <SBOYD@santanderconsumerusa.com>

Subject: FW: Attendance Recognition Program **Date:** Wed, 16 Mar 2016 01:46:43 +0000

Importance: Normal

Sabrina,

Stephanie asked me yesterday to ask you if you would be able to pull from kronos or any other program the amount of people whom would have had perfect attendance for Q4, Kutiper was asking for these numbers, please see dialogue below.

I know Reena had reached out to HRIS for this, so I am unsure if we can pull this or it has to come from them. In case you can, please make this a priority tomorrow morning as she needs to get this to Tony pretty quick at this point.

Thanks

Yessica Adriano, SPHR, SHRM-SCP

Santander Consumer USA Inc. Manager Human Resources

PHONE 214.722.5667 MOBILE 214.215.5258

EMAIL <u>yadriano@santanderconsumerusa.com</u>
WEB <u>www.santanderconsumerusa.com</u>

From: Stephanie Elad

Sent: Friday, March 11, 2016 4:59 PM

To: Reena Mathew **Cc:** Yessica Adriano

Subject: RE: Attendance Recognition Program

Please have them sent to Yessica and me. I would like to review before sending to Tony.

From: Reena Mathew

Sent: Friday, March 11, 2016 4:49 PM

To: Stephanie Elad **Cc:** Yessica Adriano

Subject: RE: Attendance Recognition Program

Ok, np. I will check with HRIS and ask them to email the numbers directly to you and Tony.

My guess is they should be able to do it by next week.

Thanks, Reena Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 193 of 377 PageID 1018

Sent: Friday, March 11, 2016 4:47 PM

To: Reena Mathew **Cc:** Yessica Adriano

Subject: RE: Attendance Recognition Program

Is there any way we can get this done sooner than that? I'd like to get back to Tony next week if possible.

From: Reena Mathew

Sent: Friday, March 11, 2016 4:28 PM

To: Stephanie Elad **Cc:** Yessica Adriano

Subject: RE: Attendance Recognition Program

HI Stephanie,

I will be OOO next week but will have those numbers when I return if that's ok.

I am also partnering with HRIS to assist but wanted to give you a status update before I left.

Thanks, Reena

From: Reena Mathew

Sent: Thursday, March 10, 2016 9:18 AM **To:** Anthony Kutiper; Stephanie Elad

Subject: RE: Attendance Recognition Program

Good Morning Tony/Stephanie,

I will get that count for you.

Thanks, Reena

From: Anthony Kutiper

Sent: Thursday, March 10, 2016 8:25 AM **To:** Stephanie Elad; Reena Mathew

Subject: RE: Attendance Recognition Program

I am fine with it. If we could get a count of how many people would have qualified in Q4 last year that would be great.

From: Stephanie Elad

Sent: Wednesday, March 09, 2016 3:27 PM

To: Anthony Kutiper

Subject: Attendance Recognition Program

Hi Tony – Reena Mathew (on my team at LEW) put this together at Brad's suggestion. Troy was on board with rolling it out, but I wanted to run it by you as well. Other than a concern about how we handle FMLA Associates (which we will have to sort out), I think we're good to go.

Please review and advise. If you are in agreement that we should move forward, I will discuss on an upcoming team call.

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 194 of 377 PageID 1019

Thanks!

Stephanie Elad, SPHR

Santander Consumer USA Inc. Director, Human Resources

PHONE 214.237.3713 MOBILE 214.695.1278

EMAIL selad@santanderconsumerusa.com

WEB www.santanderconsumerusa.com

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 195 of 377 PageID 1020

From: "Reena Mathew" </O=D6ORG/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=REENA MATHEW0CB>

To: "Stephanie Elad" < selad@santanderconsumerusa.com>

Cc: "Yessica Adriano" < YADRIANO@santanderconsumerusa.com>

Subject: RE: Attendance Recognition Program **Date:** Fri, 11 Mar 2016 23:00:46 +0000

Importance: Normal

Ok, will do...

From: Stephanie Elad

Sent: Friday, March 11, 2016 4:59 PM

To: Reena Mathew **Cc:** Yessica Adriano

Subject: RE: Attendance Recognition Program

Please have them sent to Yessica and me. I would like to review before sending to Tony.

From: Reena Mathew

Sent: Friday, March 11, 2016 4:49 PM

To: Stephanie Elad **Cc:** Yessica Adriano

Subject: RE: Attendance Recognition Program

Ok, np. I will check with HRIS and ask them to email the numbers directly to you and Tony.

My guess is they should be able to do it by next week.

Thanks, Reena

From: Stephanie Elad

Sent: Friday, March 11, 2016 4:47 PM

To: Reena Mathew **Cc:** Yessica Adriano

Subject: RE: Attendance Recognition Program

Is there any way we can get this done sooner than that? I'd like to get back to Tony next week if possible.

From: Reena Mathew

Sent: Friday, March 11, 2016 4:28 PM

To: Stephanie Elad **Cc:** Yessica Adriano

Subject: RE: Attendance Recognition Program

HI Stephanie,

I will be 000 next week but will have those numbers when I return if that's ok.

1 am als Gasta 3:123 - CM+1914940 NssiRoch mente 360 give to 09/39/3444 up Bayse 196 of 8.77 Page ID 1021

Thanks, Reena

From: Reena Mathew

Sent: Thursday, March 10, 2016 9:18 AM **To:** Anthony Kutiper; Stephanie Elad

Subject: RE: Attendance Recognition Program

Good Morning Tony/Stephanie,

I will get that count for you.

Thanks, Reena

From: Anthony Kutiper

Sent: Thursday, March 10, 2016 8:25 AM **To:** Stephanie Elad; Reena Mathew

Subject: RE: Attendance Recognition Program

I am fine with it. If we could get a count of how many people would have qualified in Q4 last year that would be great.

From: Stephanie Elad

Sent: Wednesday, March 09, 2016 3:27 PM

To: Anthony Kutiper

Subject: Attendance Recognition Program

Hi Tony – Reena Mathew (on my team at LEW) put this together at Brad's suggestion. Troy was on board with rolling it out, but I wanted to run it by you as well. Other than a concern about how we handle FMLA Associates (which we will have to sort out), I think we're good to go.

Please review and advise. If you are in agreement that we should move forward, I will discuss on an upcoming team call.

Thanks!

Stephanie Elad, SPHR

Santander Consumer USA Inc. Director, Human Resources

PHONE 214.237.3713 MOBILE 214.695.1278

EMAIL <u>selad@santanderconsumerusa.com</u>
WEB <u>www.santanderconsumerusa.com</u>

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 197 of 377 PageID 1022

From: "Reena Mathew" <rmathew@santanderconsumerusa.com>

To: "Paula Blayney" <pblayney@santanderconsumerusa.com>, "Maria Cruz"

<MACRUZ@santanderconsumerusa.com>, "Nelda Flores"

<NFLORES@santanderconsumerusa.com>

Cc: "Yessica Adriano" < YADRIANO@santanderconsumerusa.com>

Subject: Re: Attendance Report

Date: Wed, 16 Mar 2016 00:51:31 +0000

Importance: Normal

Hi Ladies,

Have you had a chance to review the following request?

Thanks in advance...it's appreciated!

Reena

Sent from my iPhone

On Mar 11, 2016, at 5:07 PM, Reena Mathew < <u>rmathew@santanderconsumerusa.com</u> > wrote:

Hi ladies,

I need your assistance please!

I will be OOO and PB, not sure if you remember speaking about the perfect attendance proposal, but Tony Kutiper would like to see numbers for last quarter.

This would be perfect attendance for all Operational associates tied to the attendance policy for Q4/2015.

The criteria would be:

Associates who have only taken pre-approved time off such as Vacation, Floating Holiday, Personal, FMLA/LOA.

If you could do one report with FMLA (consecutive or intermittent)/LOA and one without, I think that would be helpful too!

Can you please run the report and send to Stephanie Elad/Yessica Adriano sometime next week as Tony would like to review asap?

Thanks so much and let me know if you all need any additional information.

Reena

Reena Mathew, PHR

Santander Consumer USA Inc. HR Business Partner

PHONE 214.292.2772 MOBILE 214.364.9136 FAX Case 3628v-01494-N Document 36 Filed 09/20/24 Page 198 of 377 PageID 1023

 EMAIL
 rmathew@santanderconsumerusa.com

 WEB
 www.santanderconsumerusa.com

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 199 of 377 PageID 1024

From: Yessica Adriano < YADRIANO@santanderconsumerusa.com>

To: Stephanie Elad <selad@santanderconsumerusa.com>

Subject: RE: Attendance Report

Date: Thu, 17 Mar 2016 19:58:34 +0000

Importance: Normal

Inline-Images: image001.jpg

I know, this whole thing has become a nightmare.

From: Stephanie Elad

Sent: Thursday, March 17, 2016 1:44 PM

To: Yessica Adriano

Subject: FW: Attendance Report

This should not be this complicated. Sheesh!

From: Sabrina Boyd

Sent: Thursday, March 17, 2016 1:20 PM

To: Paula Blayney; Yessica Adriano; Maria Cruz; Nelda Flores

Cc: Stephanie Elad; Reena Mathew **Subject:** RE: Attendance Report

Hi Paula,

Below is what we were able to pull as a list of cost centers under Tony. We had to pull the Employee Detail Report from his Supv Org, transfer to Excel, filter, and screen shoot the list of cost centers from the cost center column. Do you all have an easier way of pulling this information for future use?



Clear Filter From "Cost Centers"

Filter by Color

Text Filters

Search

- Select All)
- ☑ 024004 SC Office of Consumer Practices
- ✓ 036002 Account Services Unit ASU
- ✓ 036003 Insurance
- ₹ 036004 Titles
- ✓ 036005 Bankruptcy
- ✓ 036202 CC Account Services Unit
- ✓ 036203 CC Insurance
- 036204 CC Titles
- ✓ 036205 CC Bankruptcy
- ✓ 038000 Specialized Services
- ─ 046000 Customer Service Operations
- ✓ 046001 Customer Service
- ✓ 046003 OSP Vendor Management
- 046201 CC Customer Service Support
- ✓ 047000 Recovery Operations
- ✓ 047001 Reinstatements
- ✓ 047002 Vendor Oversight
- ✓ 047003 Collateral Recovery
- ✓ 047004 Non Collateral Deficiency
- ✓ 047201 CC Reinstatements
- 047202 CC Vdr Oversight
- ✓ 047203 CC Coll Recv
- ✓ 047204 CC Non Coll Recy
- 047301 Unsecured Credit Card
- 049000 Collections Operations
- € 049001 Early Stage
- ✓ 049002 Late Stage
- ── 049201 CC Early Stage
- 049202 CC Late Stage
- ✓ 050001 Impounds
- —

 ✓ 050201 CC Impounds
- ☑ 050203 CC Asset Remarketing
- ✓ 054000 Funding Operations
- ✓ 054001 Core Funding
- ✓ 054003 Core Call Center
- ✓ 054004 CarMax
- ✓ 054005 Funding Direct
- ✓ 054008 Funding Support
- ✓ 054011 Consumer Fraud Prevention
- ₩ 054201 CC Funding
- 054203 CC Call Center
- ✓ 054211 CC Consumer Fraud Prevention
- ✓ 054500 NMAC
- ✓ 056001 RL Orig Operations
- ₩ 056002 RL Sales

Please a Grand Richard Report Report 36 Filed 09/20/24 Page 201 of 377 Page ID 1026

024003 - Replevin

031001 – Quality Control

031008 - CBR

031009 - OOP (SC Office of Consumer Practices)

031209 -- OOP (SC Office of Consumer Practices)

Thank you,

Sabrina

Sabrina Boyd

Santander Consumer USA Inc.

HR Generalist

PHONE 214.261.1619 MOBILE 469.834.6208

EMAIL <u>sboyd@santanderconsumerusa.com</u>
WEB <u>www.santanderconsumerusa.com</u>

From: Paula Blayney

Sent: Thursday, March 17, 2016 12:31 PM

To: Sabrina Boyd; Yessica Adriano; Maria Cruz; Nelda Flores

Cc: Stephanie Elad; Reena Mathew **Subject:** RE: Attendance Report

Hi Sabrina,

To ensure I included the correct cost centers with the recent moves, can you please send me a list of those?

Thank you,

Paula Blayney

Santander Consumer USA Inc.

HRIS Manager

Mobile-214-354-6913

From: Sabrina Boyd

Sent: Thursday, March 17, 2016 9:23 AM

To: Paula Blayney; Yessica Adriano; Maria Cruz; Nelda Flores

Cc: Stephanie Elad; Reena Mathew **Subject:** RE: Attendance Report

Good Morning Paula,

We have highlighted the paycodes needed for the report. We would need to include all cost centers under Tony Kutiper's group who are on the Operational Attendance Policy (Operations) for each site. The dates we would like to include are Q4 Oct $1 - \text{Dec } 31\ 2015$.

Please let us know if you have any questions, thank you for your assistance with this.

Sabrina Boyd

Santander Consumer USA Inc. HR Generalist

PHONE 214.261.1619 MOBILE 469.834.6208

EMAIL <u>sboyd@santanderconsumerusa.com</u>
WEB <u>www.santanderconsumerusa.com</u>

From: Paula Blayney

Sent: Wednesday, March 16, 2016 5:46 PM

To: Yessica Adriano; Sabrina Boyd; Maria Cruz; Nelda Flores

Cc: Stephanie Elad

Subject: RE: Attendance Report

Hello Yessica,

I would be happy to assist. I will need more detailed information. Please see below:

- Please confirm the date range for Q4- 2015 Oct 1 to Dec 31
- We will need ALL of the pay codes, I asked prior wouldn't you want to include the regular holiday, do we also need to include PFML, BREV etc (I have included a list that has all of the pay codes for you to review)?
- What cost centers do we need to include

Please send us back this info so we can review and pull the requested data.

Regards,

Reg

HOLWRKD

OVT

Vac Ex

Vac Unex

Sick

BERV

BERV-UNPD

BERV-EXCESS

BERV-PER

BERV-SICK

BERV-VAC

Jury

Per

Exc Hrs

Unpd Excus

Unpd Unex

Holiday Hrs

FIHol Unex

FL Hol Ex

No Call No Show MILITARY LEAVE

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 203 of 377 PageID 1028

Separate Report for FMLA Data as well as on the main report, please. [☺]

FMLA Vac

FMLA Sick

FMLA Pers

LOA Vac

LOA Sick

LOA Pers

LOA UnPd

FMLA UnPd

PFMLA VAC

PFMLA PER

PFMLA SIC

PFMLA PD

PFMLA UNPD

WK-COMP

FMLA-EXCESS

PFMLA-EXCESS

LV-CFRA

LV-EXCESS

LV-FMLA

LV-FMLAMIL

LV-LOA

LV-MILITARY

LV-PERSONAL

LV-SICK

LV-VACATION

LV-WK COMP

Paula Blayney

Santander Consumer USA Inc.

HRIS Manager

Mobile-214-354-6913

From: Yessica Adriano

Sent: Wednesday, March 16, 2016 4:57 PM

To: Sabrina Boyd; Paula Blayney; Maria Cruz; Nelda Flores

Cc: Stephanie Elad

Subject: RE: Attendance Report

Good evening Paula,

Tony Kutiper, our EVP for Call Center Operations, is requesting a report that reflects perfect attendance for associates under his realm for Q4. They are considering implementing a perfect attendance campaign, but first wanted to get a snap shot of what that would look like.

Sabrina spent three hours today reconciling a report from kronos, then manually eliminating department numbers....though she is having difficulty separating by the criteria requested to retrieve a clean list for a 3 month

period. Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 204 of 377 PageID 1029

This is the criteria:

- Associates who have only taken pre-approved time off such as Vacation, Floating Holiday, Personal, FMLA/LOA.
- If you could do one report with FMLA (consecutive or intermittent)/LOA and one without, I think that would be helpful too!

Will your group be able to pull this for us, or may you please guide us on how to do it.

Thank you, Yessica

From: Sabrina Boyd

Sent: Wednesday, March 16, 2016 1:57 PM **To:** Paula Blayney; Maria Cruz; Nelda Flores

Cc: Yessica Adriano

Subject: RE: Attendance Report

Hi Paula,

My apologies, I do not have very much background on this project as Reena was heading this one. I was under the impression that you all had discussions regarding her request?

I will see what I can pull via Kronos and reach out to you all for any questions.

Thank you,

Sabrina

Sabrina Boyd

Santander Consumer USA Inc.

HR Generalist

PHONE 214.261.1619 MOBILE 469.834.6208

EMAIL <u>sboyd@santanderconsumerusa.com</u>
WEB <u>www.santanderconsumerusa.com</u>

From: Paula Blayney

Sent: Wednesday, March 16, 2016 1:03 PM **To:** Sabrina Boyd; Maria Cruz; Nelda Flores

Cc: Yessica Adriano

Subject: RE: Attendance Report

Hello Sabrina,

Not quite sure what the data request is. The data would need to be pulled from Kronos (reconcile timecard). You referenced Q4 so the dates would be Oct 1 to Dec 31? Also what about the Holidays?

Tks

Paula Blayney

Santander Consumer USA Inc.

HRIS Manager

From: Sabrina Boyd

Sent: Wednesday, March 16, 2016 7:44 AM **To:** Paula Blayney; Maria Cruz; Nelda Flores

Cc: Yessica Adriano

Subject: FW: Attendance Report

Importance: High

Good Morning Ladies,

While Reena is out of the office, we wanted to follow up to see if you were able to pull the attendance information she requested? We would like to pass this information along for review by Tony Kutiper as soon as possible.

Please let me know if you have any questions.

Thank you,

Sabrina

Sabrina Boyd

Santander Consumer USA Inc. HR Generalist

PHONE 214.261.1619 MOBILE 469.834.6208

EMAIL <u>sboyd@santanderconsumerusa.com</u>
WEB <u>www.santanderconsumerusa.com</u>

From: Reena Mathew

Sent: Friday, March 11, 2016 5:08 PM **To:** Paula Blayney; Maria Cruz; Nelda Flores

Subject: Attendance Report

Importance: High

Hi ladies,

I need your assistance please!

I will be OOO and PB, not sure if you remember speaking about the perfect attendance proposal, but Tony Kutiper would like to see numbers for last quarter.

This would be perfect attendance for all Operational associates tied to the attendance policy for Q4/2015.

The criteria would be:

Associates who have only taken pre-approved time off such as Vacation, Floating Holiday, Personal, FMLA/LOA.

If you could do one report with FMLA (consecutive or intermittent)/LOA and one without, I think that would be helpful too!

Can you please run the report and send to Stephanie Elad/Yessica Adriano sometime next week as Tony would like to review asap?

Reena

Reena Mathew, PHR

Santander Consumer USA Inc. HR Business Partner

PHONE 214.292.2772

MOBILE 214.364.9136

FAX 214.630.0828

EMAIL <u>rmathew@santanderconsumerusa.co</u>m

WEB <u>www.santanderconsumerusa.com</u>

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 207 of 377 PageID 1032

From: Holly Hanes hhanes@santanderconsumerusa.com

To: Yessica Adriano < YADRIANO@santanderconsumerusa.com >, Stephanie Elad

<selad@santanderconsumerusa.com>

Subject: RE: Recap of Meeting

Date: Mon, 21 Mar 2016 20:39:32 +0000

Importance: Normal

That works. Just let me know when you are available. Thanks!

Holly Hanes

Santander Consumer USA Inc. HR Operational Analyst III

PHONE 972.761.1039 FAX 972.759.5330

EMAIL <u>hhanes@santanderconsumerusa.com</u>
WEB www.santanderconsumerusa.com

From: Yessica Adriano

Sent: Monday, March 21, 2016 3:03 PM **To:** Stephanie Elad; Holly Hanes **Subject:** RE: Recap of Meeting

Jumping into interview now, im not available until after 4 pm.

thanks

From: Stephanie Elad

Sent: Monday, March 21, 2016 3:02 PM

To: Holly Hanes < hhanes@santanderconsumerusa.com ; Yessica Adriano < YADRIANO@santanderconsumerusa.com >

Subject: RE: Recap of Meeting

When are you thinking?

From: Holly Hanes

Sent: Monday, March 21, 2016 2:54 PM

To: Yessica Adriano **Cc:** Stephanie Elad

Subject: RE: Recap of Meeting

Thanks Yessica. Are you and Stephanie available for a quick call with the attorneys?

Holly Hanes

Santander Consumer USA Inc. HR Operational Analyst III

PHONE 972.761.1039 FAX 972.759.5330 www.santanderconsumerusa.com

From: Yessica Adriano

Sent: Monday, March 21, 2016 9:02 AM

To: Holly Hanes **Cc:** Stephanie Elad

Subject: FW: Recap of Meeting

Hi Holly,

Below is the recap we will be sending back, my comments are highlighted in blue.

Thanks

From: Reena Mathew < rmathew@santanderconsumerusa.com >

Date: March 8, 2016 at 3:58:02 PM CST

To: Yessica Adriano < YADRIANO@santanderconsumerusa.com>

Subject: Recap of Meeting

Hi Yessica,

Here is a recap of what we discussed today.

You asked me how things were going from my perspective—I said they were good so far and felt like you and I were working well together. I feel as though things are more clear on my end and I know what's expected of me. No issues so far.

<u>Attendance</u>—This has been going well; I've been giving enough notification for time off and to continue to do so. You also thanked me for scheduling appointments on WFH days.

Yes agreed.

<u>Time Management</u>—Been good here-if there has been additional time that I've been needing, I've been giving enough notice of that (a day extra etc). Last week Sabrina was out and we worked together and everyone jumped in to knock out the inbox and you said thank you for that. Investigation Summary—overall good—one additional item needed—don't forget recap and if there are DA's, specify what type of DA's they were (call model vs. attendance) and if there was a call that you had to listen to etc. so we have a breakdown of exactly what type of DA's we're drafting. Yes thank you for you your help with admin tasks, I also asked for specifics on your weekly recap that specified the investigations (names) and the type of DA's conducted.

Consulting—I've been touching base regarding decisions that had to be made—continue to do so. One thing you all would like to see is for me to make decisions so more of discussing thoughts regarding allegations at the beginning and then follow up with recommendation at the end of investigation. Would like to see me make more of the decisions vs. consulting with Manager to see if she agrees with recommendation along the way. I stated I don't have a problem doing that (I also stated that I disagree that I am touching base often per Stephanie), but during this time I would rather not because to me it may backfire and I don't feel comfortable in doing so. I would definitely be more than willing to strive to get there at some point if that is the direction we are headed with HRBP's and investigations. Obviously escalated issues would need more interaction between the Manager and HRBP.

Today, you consult with me (your manager) as issues arise in investigations or day to day, we would like to see you make more of these decisions on your own. I provided an example: during an investigation I consult with my manager

and we GREGS 3:43 (No. 1) 149,40 In PRELIDENT OF GREAT REPORT OF INVESTIGATION PROBLEM AND A GREAT REPORT OF INVESTIGATION PROBLEM AND A GREAT REPORT OF INVESTIGATION WITH THE PROBLEM AND A GREAT REPORT OF INVESTIGATION WITH THE PROBLEM AND A GREAT REPORT OF INVESTIGATION WITH THE PROBLEM AND A GREAT REPORT OF INVESTIGATION OF THE PROBLEM AND A GREAT REPORT OF THE PROBLEM AND A

You all stated that I am more where I need to be as an HRBP.

Let me know if you need anything else.

Thanks, Reena

Reena Mathew, PHR

Santander Consumer USA Inc. HR Business Partner

PHONE 214.292.2772

MOBILE 214.364.9136

FAX 214.630.0828

EMAIL <u>rmathew@santanderconsumerusa.co</u>m

WEB <u>www.santanderconsumerusa.com</u>

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 210 of 377 PageID 1035

From: Yessica Adriano < YADRIANO@santanderconsumerusa.com>

To: Reena Mathew <rmathew@santanderconsumerusa.com>

Subject: Recap of Meeting

Date: Tue, 22 Mar 2016 21:30:13 +0000

Importance: Normal

Reena,

Thanks for the recap, my comments are highlighted in blue.

Yessica

From: Reena Mathew < rmathew@santanderconsumerusa.com >

Date: March 8, 2016 at 3:58:02 PM CST

To: Yessica Adriano < YADRIANO@santanderconsumerusa.com>

Subject: Recap of Meeting

Hi Yessica,

Here is a recap of what we discussed today.

You asked me how things were going from my perspective—I said they were good so far and felt like you and I were working well together. I feel as though things are more clear on my end and I know what's expected of me. No issues so far.

<u>Attendance</u>—This has been going well; I've been giving enough notification for time off and to continue to do so. You also thanked me for scheduling appointments on WFH days.

Yes agreed.

<u>Time Management</u>—Been good here-if there has been additional time that I've been needing, I've been giving enough notice of that (a day extra etc). Last week Sabrina was out and we worked together and everyone jumped in to knock out the inbox and you said thank you for that. Investigation Summary—overall good—one additional item needed—don't forget recap and if there are DA's, specify what type of DA's they were (call model vs. attendance) and if there was a call that you had to listen to etc. so we have a breakdown of exactly what type of DA's we're drafting. Yes thank you for you your help with admin tasks, I also asked for specifics on your weekly recap that specified the investigations (names) and the type of DA's conducted.

Consulting—I've been touching base regarding decisions that had to be made—continue to do so. One thing you all would like to see is for me to make decisions so more of discussing thoughts regarding allegations at the beginning and then follow up with recommendation at the end of investigation. Would like to see me make more of the decisions vs. consulting with Manager to see if she agrees with recommendation along the way. I stated I don't have a problem doing that (I also stated that I disagree that I am touching base often per Stephanie), but during this time I would rather not because to me it may backfire and I don't feel comfortable in doing so. I would definitely be more than willing to strive to get there at some point if that is the direction we are headed with HRBP's and investigations. Obviously escalated issues would need more interaction between the Manager and HRBP.

Today, you consult with me (your manager) as issues arise in investigations or day to day, we would like to see you make more of these decisions on your own. I provided an example: during an investigation I consult with my manager and we discuss an action plan, during its execution different issues arise such as the need to investigate more people, another item unveiled, etc., I make judgment calls on next steps and review back with my manager at the end of the investigation with its final recommendation and then review additional steps that were taken and why. For example, in the Janice Jones investigation we decided upon action plan, however as you speak to a witness you discover

additionapseo3:23581741494tNhDQCyperR1636orEWAQ9620423 is an agen2411 of ware in PageIDy4036 knowledge base to make the call.

We stated we understood your hesitation, however the expectation of our HRBPs as consultants is to work independently in anticipating and making judgment calls as necessary, and work with management in escalated situations.

You all stated that I am more where I need to be as an HRBP.

Let me know if you need anything else.

Thanks, Reena

Reena Mathew, PHR

Santander Consumer USA Inc. HR Business Partner

PHONE 214.292.2772

MOBILE 214.364.9136

FAX 214.630.0828

 EMAIL
 rmathew@santanderconsumerusa.com

 WEB
 www.santanderconsumerusa.com

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 212 of 377 PageID 1037

From: "Reena Mathew" </O=D6ORG/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=REENA MATHEW0CB>

To: "Yessica Adriano" < YADRIANO@santanderconsumerusa.com>

Subject: Recap

Date: Thu, 24 Mar 2016 18:21:06 +0000

Importance: Normal

Hi Yessica,

Here is a recap of our meeting yesterday:

<u>Attendance</u>—Continues to be good; continue to give enough notification.

<u>Time Management</u>—Give recap of DA's and investigations moving forward.

Consulting—Expectation of HRBP's is moving towards independent judgment calls; HRBP's are expected to formulate plan at the beginning and recommendation at the end; if additional steps need to be taken, use judgment call; you all said you understood my hesitation due to current situation but stated that is the direction we are moving; also to rely on past consulting and judgment calls—we've been on the same page 90% of the time. If there are escalated issues or if Manager is unavailable, we can go to other HR Managers. Want us to be confident in making decisions. Stephanie then proceeded to ask about the timeline of events regarding the Perfect Attendance proposal numbers. I stated I had sent an email on Friday but that was after I had asked her if she needed them before I left and she had stated yes. We had a lot going on and I wanted to tie up loose ends before I left. Because it was a basic report, I didn't think it would be so hard to retrieve from HRIS and stated we have issues in getting a timely response (and that goes for several of us). Stephanie stated she felt as though she was 'misled' and it was a 'misrepresentation' stating that I had been in contact with HRIS. I said that was not my intention and that what I meant was we've been working on this project back and forth for some time and Paula was aware of this upcoming proposal. That is all I meant from that statement. I sent the email on Friday and we only received a response that next Wednesday after Yessica sent another follow up email after I had informed her I wasn't getting a response (even if it just meant them sending us instructions). HRIS then stated they couldn't pull it and Sabrina and I spoke and she manually filtered the report but wasn't getting the information we needed and then HRIS stated they were able to after that. I even worked during my vacation to get this settled and I also mentioned that this was a project that I took on (after Brad Denetz and I have spoken for some time and Stephanie said I wasn't taking ownership) and it wasn't assigned so I wouldn't not allow this issue to paint me in a negative light. Stephanie mentioned she had concerns and that I wasn't meeting the expectation of an HRBP however I stated that is not what was said in the last meeting (stated I was where I needed to be as an HRBP).

**Just as a side note, we were waiting on Brad to respond with what pay codes the other business leaders approved and we received that yesterday. I sent it to HRIS and contacted Paula and she will be sending over the numbers we requested this afternoon. I will be sending those over.

Reena Mathew, PHR

Santander Consumer USA Inc. HR Business Partner

PHONE 214.292.2772

MOBILE 214.364.9136

FAX 214.630.0828

EMAIL rmathew@santanderconsumerusa.com
WEB www.santanderconsumerusa.com

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 214 of 377 PageID 1039

From: "Reena Mathew" <rmathew@santanderconsumerusa.com>

To: "Stephanie Elad" < selad@santanderconsumerusa.com>

Cc: "Yessica Adriano" < YADRIANO@santanderconsumerusa.com>, "Edward Fabritiis"

<efabritiis@santanderconsumerusa.com>, "Kayla Liggett"
<kliggett@santanderconsumerusa.com>, "Angelina Hullum"

<AHULLUM@santanderconsumerusa.com>

Subject: Re: Attendance Recognition Program **Date:** Mon, 28 Mar 2016 17:24:53 +0000

Importance: Normal

Hi Stephanie,

Will do for the 2015 report/talking points.

I'll also check with HRIS to see what the best course of action is to have the report run.

Please let me know if you need anything else.

Thanks, Reena

Sent from my iPhone

On Mar 28, 2016, at 11:12 AM, Stephanie Elad < selad@santanderconsumerusa.com > wrote:

Hi Reena – I reviewed the HRIS report data with the SVP's today. They would like to see the information for all of 2015. Please work with HRIS to have that report run ASAP, but no later than Friday. If you need to escalate to Yessica or me, just let us know. They are trying to get an idea of how many YEI points to budget for this year.

The program will start Q1. So, we will need to get on a regular cadence with this quarterly report. I would think that we should be able to pull the data within 2 weeks of when the quarter ends. Is that feasible? Also, will we be able to run the report ourselves, now that it is built, or will we need to rely on HRIS every time? Please advise.

Finally, I'd like to provide the business with talking points to introduce and cascade this program. Please put something together for my review by EOD Friday. Yessica should review and provide input prior to sending to me. This communication will go to the Associate level.

Let me know if you have questions. Thank you.

Stephanie Elad, SPHR

Santander Consumer USA Inc. Director, Human Resources

PHONE 214.237.3713 MOBILE 214.695.1278

EMAIL <u>selad@santanderconsumerusa.com</u>
WEB www.santanderconsumerusa.com

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 215 of 377 PageID 1040

From: Stephanie Elad <selad@santanderconsumerusa.com> **To:** Holly Hanes hhanes@santanderconsumerusa.com>

Subject: FW: Attendance Report

Date: Tue, 29 Mar 2016 17:43:24 +0000

Importance: Normal

Request sent to HRIS at 5:07pm on March 11.

From: Yessica Adriano

Sent: Wednesday, March 16, 2016 4:25 PM

To: Stephanie Elad <selad@santanderconsumerusa.com>

Subject: RE: Attendance Report

Tony submitted the request Thursday morning (8:25 am), and she submitted the request to HRIS on Friday at 5 pm- so two business days

From: Stephanie Elad

Sent: Wednesday, March 16, 2016 4:17 PM

To: Yessica Adriano

Subject: RE: Attendance Report

How long did she wait from the time Tony requested it until she asked HRIS for the info? Sounds like about 24 hours, but maybe I'm missing something.

From: Yessica Adriano

Sent: Wednesday, March 16, 2016 1:21 PM

To: Stephanie Elad

Subject: FW: Attendance Report

FYI..

From: Reena Mathew

Sent: Wednesday, March 16, 2016 10:59 AM

To: Yessica Adriano

Subject: Fwd: Attendance Report

Hi Yessica,

Geesh, I don't know why it takes them so long to respond. I sent the initial email on Friday.....or at least just give us instructions on how to pull the info.

Sent from my iPhone

Begin forwarded message:

From: Reena Mathew < rmathew@santanderconsumerusa.com >

Date: March 15, 2016 at 7:51:31 PM CDT

To: Paula Blayney pblayney@santanderconsumerusa.com>, Maria Cruz <</pre>MACRUZ@santanderconsumerusa.com>,

Nelda Flores < NFLORES@santanderconsumerusa.com >

Cc: Yes Gas Rabiano CVAD RAPAD los sa Dag sument 36 er Fijled A9/20/24 Page 216 of 377 Page ID 1041

Subject: Re: Attendance Report

Hi Ladies,

Have you had a chance to review the following request?

Thanks in advance...it's appreciated!

Reena

Sent from my iPhone

On Mar 11, 2016, at 5:07 PM, Reena Mathew <<u>rmathew@santanderconsumerusa.com</u>> wrote:

Hi ladies,

I need your assistance please!

I will be OOO and PB, not sure if you remember speaking about the perfect attendance proposal, but Tony Kutiper would like to see numbers for last quarter.

This would be perfect attendance for all Operational associates tied to the attendance policy for Q4/2015.

The criteria would be:

Associates who have only taken pre-approved time off such as Vacation, Floating Holiday, Personal, FMLA/LOA.

If you could do one report with FMLA (consecutive or intermittent)/LOA and one without, I think that would be helpful too!

Can you please run the report and send to Stephanie Elad/Yessica Adriano sometime next week as Tony would like to review asap?

Thanks so much and let me know if you all need any additional information.

Reena

Reena Mathew, PHR

Santander Consumer USA Inc. HR Business Partner

PHONE 214.292.2772

MOBILE 214.364.9136

FAX 214.630.0828

EMAIL rmathew@santanderconsumerusa.com

WEB www.santanderconsumerusa.com

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 217 of 377 PageID 1042

From: Stephen Shaffer <sshaffer@santanderconsumerusa.com>

To: Stephanie Elad <selad@santanderconsumerusa.com>

Cc: Holly Hanes hhanes@santanderconsumerusa.com/, Yessica Adriano

<YADRIANO@santanderconsumerusa.com>

Subject: RE: Reena

Date: Fri, 01 Apr 2016 22:15:10 +0000

Importance: Normal

Sounds like a specific we need to document and I think you should say that it should not have taken more than 30 minutes.

In the future when we give her a task like this (until we can talk) we should say.

I need you to do X,Y,Z and you should take no longer than x amount of time to do it and I expect it no later than 5:00pm on x date. This assignment should have in it the following points - a,b,c,d, e, and f. We should not tell her how to do it

Stephen Shaffer Santander Consumer USA Inc. VP Human Resources Business Partnership

PHONE
214.722.4580
MOBILE
469.236.5931
EMAIL
sshaffer@santanderconsumerusa.com
WEB
www.santanderconsumerusa.com

----Original Message-----From: Stephanie Elad

Sent: Friday, April 01, 2016 5:11 PM

To: Stephen Shaffer <sshaffer@santanderconsumerusa.com>

Cc: Holly Hanes https://hones.go.ntanderconsumerusa.com YADRIANO@santanderconsumerusa.com

Subject: Reena

Just to let you know, I gave Reena a deadline of EOB today to send me some talking points around the Attendance Recognition program. I asked her to have Yessica provide feedback on this prior to sending to me.

As of right now, neither Yessica or I have received anything from Reena on this. I consider this a missed deadline. I was planning to review this information with Tony and team on Monday. At least 1 SVP is already asking. In my mind this should not have taken more than 30 minutes to complete since Reena had all of the information and created the program.

I believe I asked for this info on Tuesday. I will double check that before we provide feedback to Reena. And I will include this in our recap which we will send to Kristin for review on Monday.

Thanks!

Sent from my iPhone

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 218 of 377 PageID 1043

From: Stephanie Elad < selad@santanderconsumerusa.com>

To: Reena Mathew <rmathew@santanderconsumerusa.com>

Cc: Yessica Adriano < YADRIANO@santanderconsumerusa.com >

Subject: RE: Attendance Recognition Program **Date:** Mon, 04 Apr 2016 21:47:07 +0000

Importance: Normal

Reena - A few items needed:

- Report for Q1 2016. Due by 5:00pm on Thursday.
- List of any Associates who had perfect attendance for all 4 quarters in 2015. Due by 5:00pm on Wednesday.

Starting with Q1, 2016, please include backup (Associate names) and also indicate, how many quarters the person achieved the threshold. For example, one Associate might achieve in Q1, and not again until Q3. Another Associate might achieve in Q2 and then not again during the year. The SVP's want to see how the Associates are trending. This list should only include those who achieved one time, and then indicate subsequent quarters where the threshold was reached as well.

Let me know if you have questions. Thanks!

From: Reena Mathew

Sent: Friday, April 01, 2016 7:17 PM

To: Stephanie Elad <selad@santanderconsumerusa.com> **Cc:** Yessica Adriano <YADRIANO@santanderconsumerusa.com>

Subject: RE: Attendance Recognition Program

Hi Stephanie,

Please see the attached spreadsheet for Perfect Attendance for all four quarters in 2015 and the Perfect Attendance Talking Points.

Also, I did think about one thing—associates cannot be on any DA's for the quarter. There won't be any attendance DA's which are the majority of DA's, so I don't think the numbers will be skewed as much, however, this may be a manual process each site can do once the names are pulled (since there are over 400). Also, when we move forward with this, we will need to ensure that the associate is employed for the entire quarter as well....so that will be two things that may need to be checked on possibly manually by each site.

I spoke to Paula and she said either we (HR) can pull the report (Reconcile Timecard with the dates of quarters/pay codes) or they can assist us with it. A better idea is to have the report automated which is now possible with the updated version of Kronos and she said we can set up a call in May to work out all the kinks so that it is less manual.

Let me know if you need anything else.

Thanks, Reena

From: Stephanie Elad

Sent: Monday, March 28, 2016 11:12 AM

To: Reena Mathew < rmathew@santanderconsumerusa.com >

Cc: Yessi Gararian 32-PA/DRIAN Dan Dangument 136 ru Filesh 09/20W241 FaBagis 219 of 377 Page ID 1044

<<u>efabritiis@santanderconsumerusa.com</u>>; Kayla Liggett <<u>kliggett@santanderconsumerusa.com</u>>; Angelina Hullum <<u>AHULLUM@santanderconsumerusa.com</u>>

Subject: Attendance Recognition Program

Hi Reena – I reviewed the HRIS report data with the SVP's today. They would like to see the information for all of 2015. Please work with HRIS to have that report run ASAP, but no later than Friday. If you need to escalate to Yessica or me, just let us know. They are trying to get an idea of how many YEI points to budget for this year.

The program will start Q1. So, we will need to get on a regular cadence with this quarterly report. I would think that we should be able to pull the data within 2 weeks of when the quarter ends. Is that feasible? Also, will we be able to run the report ourselves, now that it is built, or will we need to rely on HRIS every time? Please advise.

Finally, I'd like to provide the business with talking points to introduce and cascade this program. Please put something together for my review by EOD Friday. Yessica should review and provide input prior to sending to me. This communication will go to the Associate level.

Let me know if you have questions. Thank you.

Stephanie Elad, SPHR

Santander Consumer USA Inc. Director, Human Resources

PHONE 214.237.3713 MOBILE 214.695.1278

EMAIL <u>selad@santanderconsumerusa.com</u>
WEB www.santanderconsumerusa.com

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 220 of 377 PageID 1045

From: Stephen Shaffer <sshaffer@santanderconsumerusa.com>

To: Stephanie Elad <selad@santanderconsumerusa.com>

Cc: Holly Hanes hhanes@santanderconsumerusa.com/, Yessica Adriano

<YADRIANO@santanderconsumerusa.com>

Subject: RE: Reena

Date: Fri, 01 Apr 2016 22:15:10 +0000

Importance: Normal

Sounds like a specific we need to document and I think you should say that it should not have taken more than 30 minutes.

In the future when we give her a task like this (until we can talk) we should say.

I need you to do X,Y,Z and you should take no longer than x amount of time to do it and I expect it no later than 5:00pm on x date. This assignment should have in it the following points - a,b,c,d, e, and f. We should not tell her how to do it

Stephen Shaffer
Santander Consumer USA Inc.
VP Human Resources Business Partnership

PHONE
214.722.4580
MOBILE
469.236.5931
EMAIL
sshaffer@santanderconsumerusa.com
WEB
www.santanderconsumerusa.com

----Original Message-----From: Stephanie Elad

Sent: Friday, April 01, 2016 5:11 PM

To: Stephen Shaffer <sshaffer@santanderconsumerusa.com>

Cc: Holly Hanes https://hones.google.com/; Yessica Adriano < YADRIANO@santanderconsumerusa.com; Yessica Adriano < YADRIANO@santanderconsumerusa.com

Subject: Reena

Just to let you know, I gave Reena a deadline of EOB today to send me some talking points around the Attendance Recognition program. I asked her to have Yessica provide feedback on this prior to sending to me.

As of right now, neither Yessica or I have received anything from Reena on this. I consider this a missed deadline. I was planning to review this information with Tony and team on Monday. At least 1 SVP is already asking. In my mind this should not have taken more than 30 minutes to complete since Reena had all of the information and created the program.

I believe I asked for this info on Tuesday. I will double check that before we provide feedback to Reena. And I will include this in our recap which we will send to Kristin for review on Monday.

Thanks!

Sent from my iPhone

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 221 of 377 PageID 1046

From: Yessica Adriano < YADRIANO@santanderconsumerusa.com>

To: Stephanie Elad <selad@santanderconsumerusa.com> **Cc:** Stephen Shaffer <sshaffer@santanderconsumerusa.com>

Subject: LEW Crew

Date: Fri, 01 Apr 2016 20:47:14 +0000

Importance: Normal

Good afternoon,

These are Sabrina's current responsibilities today:

- DA Creation and Entry into WD
- Kronos Audit follow up (Payroll Mondays)
- HR LEW lockbox
- Associate investigations
- Oversee Customer Service team
- @HR Help (rotation)
- HRSOL class lists
- TWC report
- Kronos Vs DA Report (Nicole compiles but Sabrina filters and follows up with all LEW Mgrs)
- Ad hoc issues that arise: manager questions, 911, answer the door

If we could remove Sabrina's responsibilities around the Kronos vs DA report, @HR Help, HRSOL, and the Kronos Audit followup (payroll) it would work. So, the ideal setting for us at LEW would be to have the two HRBPs, myself, and an HRG every Monday on site. Monday is our busiest day in regards to the HR inbox and payroll Mondays consumes a day of administration.

Thank you, Yessica

Yessica Adriano, SPHR, SHRM-SCP

Santander Consumer USA Inc. Manager Human Resources

PHONE 214.722.5667 MOBILE 214.215.5258

 EMAIL
 yadriano@santanderconsumerusa.com

 WEB
 www.santanderconsumerusa.com

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 222 of 377 PageID 1047

From: "Reena Mathew" <rmathew@santanderconsumerusa.com>

To: "Yessica Adriano" < YADRIANO@santanderconsumerusa.com>, "Reena Mathew"

<rmathew@santanderconsumerusa.com>

Subject: Conversation with Yessica Adriano **Date:** Wed, 06 Apr 2016 19:35:46 +0000

Importance: Normal

Reena Mathew [10:47 AM]:

GM Yessica

Quick question, did Dina go to Toyota or Exeter?

Yessica Adriano [10:49 AM]:

she went to exeter

gm:)

Reena Mathew [10:50 AM]:

Thanks!

Reena Mathew [12:36 PM]:

Have you by chance typed up your notes for Brittany Brodie?

Was just wondering what her main complaints were so I can add to the investigation summary.....

Yessica Adriano [1:20 PM]:

Hi reena ...larry is here for a da for evelyn do you have it, if so i can print it for him

Reena Mathew [1:22 PM]:

Hmmm, I emailed Mr. V this am.....I wonder if he's on vacay. Just sent it to you/Larry

Reena Mathew [1:42 PM]:

Did you by chance see my previous IM?:)

Yessica Adriano [1:47 PM]:

i yes sorry, im in back to back meetings. i havent typed up britanny notes yet but i will tonight

Reena Mathew [1:48 PM]:

Ok--is it ok then if turn in my summary tomm?

Yessica Adriano [2:33 PM]:

yes that works

Reena Mathew [2:33 PM]:

Ok, thx

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 223 of 377 PageID 1048

From: "Reena Mathew" </O=D6ORG/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=REENA MATHEW0CB>

To: "Yessica Adriano" < YADRIANO@santanderconsumerusa.com>

Subject: RE: Investigation Summary--Brittany Brodie

Date: Wed, 13 Apr 2016 18:31:38 +0000

Importance: Normal

Will do, thanks....

From: Yessica Adriano

Sent: Wednesday, April 13, 2016 12:50 PM

To: Reena Mathew <rmathew@santanderconsumerusa.com>

Subject: FW: Investigation Summary--Brittany Brodie

Please attach to isight.

From: Reena Mathew

Sent: Friday, April 08, 2016 5:07 PM

To: Yessica Adriano < YADRIANO@santanderconsumerusa.com >

Subject: Investigation Summary--Brittany Brodie

Hi Yessica,

Please see the summary below and notes attached for the Brittany Brodie investigation.

Date Complaint Received: 4/1/2016

Investigator: Reena Mathew, HR Business Partner; Witness: N/A

Associate: Brittany Brodie; Early Stage Account Manager

Involved Parties: Emerial Woods; Latoria Chatman—Early Stage Account Managers

Witnesses: Karen Cantu/Bryson Gray—Early Stage Account Managers; Gerald Rahm—Early Stage Manager

Timeline of Investigation:

4/1/2016: AVP Jorge Munoz receives word from Manager Gerald Rahm that there was an incident during Gerald's jumpstart that morning; Jorge meets with HR Manager Yessica Adriano to discuss; Jorge and Yessica meet with Brittany to get her side of the story and associate is suspended until pending investigation is completed

4/1/2016: Reena Mathew meets with Emerial Woods/Karen Cantu to see what information they could provide regarding the incident

4/7/2016: Reena Mathew also meets with Bryson Gray

Final Incident: On 4/1/2016, Brittany Brodie states she was in their team jumpstart and Emerial and Latoria made a hygiene comment in reference to her, she snapped and yelled back at them "Lets take it outside", Gerald attempted to calm her down and ended the team meeting.

DA History: Brittany Brodie

Final- 03/25/2016 (Attendance) Written- 02/25/2016 (Attendance)

Verbal – 02/23/2016 (Attendance)

Verbal- 02/11/2016 (Failure to Follow, careless account documentation)

Verbal- 10/14/2015 (Call Model Violation)

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 224 of 377 PageID 1049

Confirmed Accusations:

- Question regarding hygiene during jumpstart was made by Latoria to Gerald (Manager)
- High five was done between Emerial and Latoria
- Emerial did admit to allowing Latoria and vice versa to use her Workstation to clock herself in when she was running late; stated the last time it happened was a month ago
- Brittany did get assertive and stated 'We can take it outside and you can find out' towards Emerial
- One witness states LaToria and Emerial were snickering during the team meeting, and Brittany took offense to it

Alleged and Unconfirmed Accusations:

- Hygiene and high five were directed towards Brittany
- Emerial and Latoria use each other's login information (username/password) to clock each other in and out of Kronos when they're running late
- Emerial stated Latoria bumped her when she and Latoria were coming back into the building (Latoria was the only witness)
- Actions of LaToria and Emerial picking on Brittany

Recommendation: The investigation was able to prove that Brittany threatened LaToria and Emerial during the team meeting. In addition, we were unable to prove that Brittany had previously been provoked by these two individuals, and during our initial meeting with Brittany both HR and her AVP had difficulty calming her down. Due to her DA history and aggressive behavior we recommend termination for Violation of Anti-Harassment/Hostile Work Environment.

Let me know if you need any additional information.

Thanks, Reena

Reena Mathew, PHR

Santander Consumer USA Inc. HR Business Partner

PHONE 214.292.2772

MOBILE 214.364.9136

FAX 214.630.0828

EMAIL rmathew@santanderconsumerusa.com

web www.santanderconsumerusa.com

BENEFITS HOTLINE 214.540.2010

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 225 of 377 PageID 1050

From: Yessica Adriano < YADRIANO@santanderconsumerusa.com>

To: Stephanie Elad < selad@santanderconsumerusa.com>

Subject: FYI

Date: Thu, 07 Apr 2016 17:53:48 +0000

Importance: Normal

Hi Stephanie,

I asked Reena today if she was ok, she looked very pale- she told me she has anemia and feels weak. She also said she was planning on leaving by mid-May or sooner depending on how she felt. I wouldn't be surprised if she decided to take leave in the next few weeks. Which takes me to my other point, when can we schedule Sabrina to meet with you and Stephen. If she does well, I would like to have her shadow Kristen prior to Reena leaving. Thoughts?

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 226 of 377 PageID 1051

From: Yessica Adriano < YADRIANO@santanderconsumerusa.com>

To: Holly Hanes hhanes@santanderconsumerusa.com Subject: FW: Rev. Reena 90 Day Action Plan - 90 Day Check In

Date: Thu, 14 Apr 2016 15:18:35 +0000

Importance: Normal

Attachments: Rev. Reena 90 Day Action Plan - 90 Day Check In.docx

Holly,

Attached is our revised document. We only made edits to the bottom portion under 90 day followup, may you please have our legal team review.

Thanks Yessica

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 227 of 377 PageID 1052

From: Stephen Shaffer <sshaffer@santanderconsumerusa.com>

To: Stephanie Elad <selad@santanderconsumerusa.com>

Cc: Yessica Adriano < YADRIANO@santanderconsumerusa.com>, Stephen Shaffer

<sshaffer@santanderconsumerusa.com>

Subject: RE: Reena Mathew

Date: Thu, 14 Apr 2016 21:20:41 +0000

Importance: Normal

Yes, as we agreed yesterday we should move to termination.

I will work on approvals so we can move forward.

Thank you to Yessica and you for your hard work. As we discussed, it would have been great if Reena had been able to succeed, our ultimate goal, but it just has not panned out.

Regards,

Stephen Shaffer

Santander Consumer USA Inc. VP Human Resources Business Partnership

PHONE 214.722.4580 MOBILE 469.236.5931

EMAIL sshaffer@santanderconsumerusa.com

WEB www.santanderconsumerusa.com

From: Stephanie Elad

Sent: Thursday, April 14, 2016 4:11 PM

To: Stephen Shaffer <sshaffer@santanderconsumerusa.com> **Cc:** Yessica Adriano <YADRIANO@santanderconsumerusa.com>

Subject: Reena Mathew

Hi Stephen – To recap our discussion from the other day, we are at the end of the 90 day PIP and Reena is still failing to meet the expectations of the HR Business Partner role. Although her attendance has improved somewhat, there are still significant performance deficiencies in regards to the other areas identified in the PIP.

Yessica and I are planning to meet with Reena tomorrow to officially close out the PIP, and will let her know that her performance is still not meeting expectations.

At this point, I think that the appropriate next step is to terminate employment. Reena has not demonstrated that she can make the necessary improvements to her performance and remains unwilling to acknowledge that the deficiencies exist.

Stephanie Elad, SPHR

Santander Consumer USA Inc. Director, Human Resources

PHONE 214.237.3713 MOBILE 214.695.1278

 EMAIL
 selad@santanderconsumerusa.com

 WEB
 www.santanderconsumerusa.com



March 23, 2016 Meeting Recap: Reena Mathew (HRBP), Yessica Adriano (HRM), Stephanie Elad (HRD) *Note that Yessica's response was provided during the 90 day recap discussion on April 15

Attendance — Continues to be good; continue to give enough notification. Agreed

<u>Time Management</u>—Give recap of DA's and investigations moving forward.

Please continue with the specifics of the DA's and investigations handled every week.

Consulting—Expectation of HRBP's is moving towards independent judgment calls; HRBP's are expected to formulate plan at the beginning and recommendation at the end; if additional steps need to be taken, use judgment call; you all said you understood my hesitation due to current situation but stated that is the direction we are moving; also to rely on past consulting and judgment calls—we've been on the same page 90% of the time. If there are escalated issues or if Manager is unavailable, we can go to other HR Managers. Want us to be confident in making decisions. Stephanie then proceeded to ask about the timeline of events regarding the Perfect Attendance proposal numbers. I stated I had sent an email on Friday but that was after I had asked her if she needed them before I left and she had stated yes. We had a lot going on and I wanted to tie up loose ends before I left. Because it was a basic report, I didn't think it would be so hard to retrieve from HRIS and stated we have issues in getting a timely response (and that goes for several of us). Stephanie stated she felt as though she was 'misled' and it was a 'misrepresentation' stating that I had been in contact with HRIS. I said that was not my intention and that what I meant was we've been working on this project back and forth for some time and Paula was aware of this upcoming proposal. That is all I meant from that statement. I sent the email on Friday and we only received a response that next Wednesday after Yessica sent another follow up email after I had informed her I wasn't getting a response (even if it just meant them sending us instructions). HRIS then stated they couldn't pull it and Sabrina and I spoke and she manually filtered the report but wasn't getting the information we needed and then HRIS stated they were able to after that. I even worked during my vacation to get this settled and I also mentioned that this was a project that I took on (after Brad Denetz and I have spoken for some time and Stephanie said I wasn't taking ownership) and it wasn't assigned so I wouldn't not allow this issue to paint me in a negative light. Stephanie mentioned she had concerns and that I wasn't meeting the expectation of an HRBP however I stated that is not what was said in the last meeting (stated I was where I needed to be as an HRBP).

Reena, in regards to the consulting, the expectation has always been that you are able to perform independently in your role. Although I have been providing more oversight as of late, due to the performance issues identified, with your background, experience and tenure with the company, you are expected to perform your job effectively, which means handling most of your tasks without oversight. I am available if you have questions or if you need support with more complex issues.

As it relates to the incident involving the Perfect Attendance Proposal, I wanted to outline the sequence of events: March 9 (3:27pm)—Stephanie sends the proposal to EVP Tony Kutiper, asking him to review and advise if this is something he wants to implement in the call centers.

March 10 (8:25am)— Tony responds and says yes. He also requested additional information, which you responded (9:18am) and said you would provide.

March 11 (4:28pm)— You send an email to Stephanie stating that you will be out of the office the following week and will have the information that Tony requested when you return. You also stated "I am partnering with HRIS to assist but wanted to give you a status update". Stephanie replies back (4:46pm) and states she would like to get this information to Tony sooner, preferably the next week. You responded at 4:49 advising that you would ask HRIS to send the information directly to Stephanie and Tony. Stephanie replies at 4:59 stating that she would like the information sent to her, and to me, so that we could review prior to sending to Tony.

March 11 (5:07pm) – You send an email to HRIS requesting the information.

SC Action Plan Revised 01/2016

App.263 SC002422



When asked about the timeline of events, your response was that you had been working with HRIS months ago on this project. However, upon further investigation, HRIS does not recall having any conversations with you about this particular report. They did recall you asking if Kronos could be updated to capture this specific information.

In any event, your statement that "you were partnering with HRIS to assist" was misleading and is considered a misrepresentation of the truth.

I don't believe that you prioritized this request properly as the request to HRIS should have been sent much sooner. This ties in with feedback we have provided to you regarding sense of urgency and ownership of your work. This is your project and you are expected to work through the challenges and escalate to your leadership when you are unable to do so. In this case, that didn't happen. In fact, someone on the team who is junior to your position was able to step in and identify issues and help to resolve them, which ultimately led to us being able to provide the report to Tony. Significant progress was made, in your absence, and none of the issues were surfaced by you. Your role in the project was to send the request to HRIS, and then wait for them to send you back the report. When that didn't happen, you sent several emails blaming them and complaining about their response time. Instead, what I would have expected was to ensure that the request was sent more timely, followed up with them to ensure understanding and collaborate to complete the task.

When we spoke with you regarding this incident, there was a lot of blame placed on the HRIS team, and at one point you even blamed Tony Kutiper, for not responding promptly. First of all, Tony did respond promptly (within a few business hours). Second of all, Tony is the client, and his response time is not of your concern. Our team is here to provide service to Tony and his team, so we need to prioritize his requests with a sense of urgency.

Since our discussion, another issue has arisen, in regards to the Perfect Attendance Proposal project, that I feel needs to be brought to your attention. On Monday, March 28 at 11:12am, Stephanie sent you an email requesting Talking Points for the program and an updated attendance report. The deadline was EOD that Friday (April 1). Stephanie also requested that you send it to me for review and feedback prior to sending to her. The information was not sent to me until 7:17pm on April 1. This did not meet the deadline that Stephanie sent. You called me at 5:45pm and 6:14pm on April 1. I called you back a little later that evening and you said that you were stuck in an investigation (Associate Brittany) with AVP Jorge Munoz. I reminded you that my direction was that you should complete the Perfect Attendance proposal on Friday and complete the investigation the following Monday.

Reena, the concern about your ability to make good decisions about how to utilize your time remains of significant concern. I was clear that the deadline to Stephanie was your primary task for Friday. The fact that you chose to spend time on the investigation instead, even after I told you specifically to hold that until Monday shows that you are continuing not to make good choices regarding how you spend your time, and also that you are not following specific instructions from your immediate supervisor and your director. Several expectations of your role are not being met here including ability to meet deadlines, ability to push back on the business, and ability to manage your time appropriately. The Talking Points should have taken no more then 20-30 minutes to complete. This was assigned on Monday, and not submitted until after 7:00pm on Friday and was not sent to me prior to going to Stephanie, as she specifically instructed you to do. Stephanie set this deadline because she was scheduled to review this information with Tony and the SVP's on Monday morning. The delay on your part created more work for Stephanie as she did not feel comfortable cascading this document to the SVP's during their scheduled meeting on Monday morning, as I had not had the chance to review and advise. Stephanie's intent was to provide this deliverable to the clients on Monday and she was unable to do so, because you missed your deadline.

Since then, the attendance report was submitted but had material errors and had to be sent back. Unfortunately, the information was sent to the business incorrectly because you didn't validate the information prior to sending to

SC Action Plan Revised 01/2016

App.264 SC002423



Stephanie. It is your job to ensure the accuracy of the information you produce before you send it. These types of mistakes causes the business to lose credibility in their HR partners.

As it relates to the Brittany investigation, on April 6, you came to me to discuss. During that conversation, I provided you with feedback that you had not done as thorough of a job as needed in regards to this matter, and asked you to speak with 1 additional Associate. Your summary was not submitted to me until April 8, and was not complete as your notes were not attached and you did not provide all of the proper information (i.e. DA history). Reena, it's concerning that this investigation would take a week to complete and that you would need coaching on how to approach the situation, considering your tenure and experience. This is a fairly simple matter to address. This delay has created some concern with the business.

Finally, to clarify a point in our last meeting (March 8), when I stated that things were progressing well, I was referring to the 2 week period we were discussing. I did not state that meant that your performance was now at a "meets expectations" level. The issues highlighted in your PIP are still of concern, and at this point, you are still not meeting the expectations of an HR Business Partner.

SC Action Plan Revised 01/2016

App.265 SC002424



90 Day Review April 15, 2016

Timeline

01/15/2016: Administer PIP/Action Plan 01/29/2016: 1st Biweekly follow up meeting 02/17/2016: 2nd Biweekly follow up meeting

02/26/2016: 30 Day Review

03/08/2016: 3rd Biweekly follow up meeting 03/23/2016: 4th Biweekly follow up meeting

04/15/2016: 90 Day Review

Attendance

Met Expectations

You have been consistent in providing appropriate notice for requested time off. In most cases, additional hours were worked to offset the time you have left early/came in late.

Time Management/Effective Work Habits

Does Not Meet Expectations

During this 90 day period, we have discussed and provided you examples to illustrate the continued areas of opportunity in this category. We have provided you with feedback regarding:

- Providing more detail in the work you submit (time study, weekly recaps)
- Submitting work accurately
 - 2 term requests submitted incorrectly, 1 with incorrect data and 1 without investigation summaries attached (Monisha 02/15, Brittany 04/08)
 - o Incorrect data on attendance report (submitted to Stephanie on 04/06)
- Missing deadlines (missed deadline to Stephanie on attendance talking points/report, Monisha investigation notes)
 - The attendance talking points were assigned by Stephanie on 03/28 with a deadline of 04/01. In her email, Stephanie specifically requests that you have me review the document prior to sending her the final copy. You submitted your documents to Stephanie at 7:17 pm that day, without my review. In a later conversation, you stated you didn't know I was leaving early that day, I advised you I was available all day and did not leave until 4:45 pm. Hence, the prior day 03/31 I had reminded you of this priority and again on 04/01. The document was sent back, so I could review (several edits had to be made) in order to deliver a finished product to Stephanie
 - Monisha Investigation- On 02/15 we had a discussion and edits for the document provided to you by Stephanie, she advised to have this completed first thing on the morning of 02/18, it was not received until that afternoon without the edits.
- Timely follow up (email response to Stephen, completing Brittany investigation timely, reaching out to HRIS timely to complete request from an EVP, DA's being completed within 24 hours)
- Thoroughness and Quality of Work (Monisha summary having to be sent back, Brittany investigation, attendance talking points)
 - o Monisha summary was submitted without the edits that were provided

SC Action Plan Revised 01/2016



- Brittany investigation was submitted without the investigation summaries, without DA history, and revisions had to be made to the Substantiated and Unsubstantiated categories to reflect what the interview notes reflected
- The perfect attendance talking points document had to be revised in the following ways in order to be business presentable: inserted introduction, added program objective, included sub topics (objective, eligibility, rewards), reworded and expanded rules of the program, and changed format/font.
- Importance of teamwork in completing administrative tasks that come in through the @HR_help inbox. Specifically, DA administration for LEW. In March/April, you entered only 16 DA's into WorkDay, compared to 568 total for the site. This does not meet the expectation to do your share of the work to support the team.

Also, you were coached on misrepresenting the truth in an email to Stephanie regarding the sequence of events in regards to the attendance report issue.

After you having decided that you did not want to continue with the time study, we agreed that you would just provide on a weekly basis (every Friday by 5 pm) a count of the number of DA's handled and investigations conducted. This has occurred regularly.

Consulting

Does Not Meet Expectations

For the first 2/3 of the PIP period, Yessica worked with you very closely and provided constant guidance. Even with that, there were some issues, as highlighted in the previous section. Additionally, we asked you on more than one occasion if there were development or training opportunities that you wanted to take advantage of. You declined those offers.

During this 90 day period, we have provided you with feedback regarding:

- Ability to push back on the business to ensure that you complete your job tasks/duties/deadlines (Brittany investigation)
- Lack of accountability for your behaviors (blaming HRIS, Tony). These things get in the way of us being able to serve our clients effectively.
- Addressing the business regarding feedback that they may have provided regarding your performance.
 Specifically, asking "who told on me?" This is unprofessional and negatively impacts your ability to provide consulting services to your client group.

Additionally, we received feedback from the business clients regarding your performance and how you interact with them. The comments we received are as follows:

- Limited interactions, but it has been better since January. I'd rather just go to someone else on the HR team to get it done right. They are always helpful and on point.
- I am getting DA's within 2 days. I never get it within 24 hours though, which is what I thought the expectation was.
- I enjoy working with her but notice that with difficult conversations she is timid and struggles. She asked me to sit in on a conversation and when it got difficult she said that I would take over. This wasn't my Associate and I was unprepared.
- She doesn't like making decisions without checking with her manager. She isn't confident when dealing with issues. She is scared to make decisions.
- I had to sit in on a term that Reena was supposed to handle. Reena got flustered and turned it back to me to handle. It's obvious that she can't handle conflict.

SC Action Plan Revised 01/2016

App.267 SC002426



- She has had to ask for an extension (beyond 2 days) for a DA.
- I'm much more comfortable and confident working with others on the HR team because they respond timely and are confident in their decision making process.
- She is very nice. Just don't ask her for anything.

As a reminder, it is not appropriate for you to go back to the business to discuss this feedback.

At this point, you have not shown the ability or capacity to provide effective consulting services to the AVP group.

As we conclude the PIP process, it is important to state that you are still failing to meet the expectations for the HR Business Partner role.

Associate Signature	Discussion Date
Manager Signature	Director Signature

SC Action Plan Revised 01/2016

App.268 SC002427

Don Uloth

From: Reena Mathew <rmathew@santanderconsumerusa.com>

Sent: Tuesday, April 19, 2016 3:18 PM

To: Reen Subject: Fwd: Hello

Attachments: RE: Attendance Recognition Program (12.7 KB); ATT00001.htm; Re: Attendance Report

(7.70 KB); ATT00002.htm; Fwd: Attendance Report (9.08 KB); ATT00003.htm; RE: Attendance Report (289 KB); ATT00004.htm; Conversation with Yessica Adriano (13.2 KB); ATT00005.htm; Investigation Summary--Brittany Brodie (17.6 KB); ATT00006.htm; FW: Last Chance to Register for February Monthly Luncheon (432 KB); ATT00007.htm; Attendance Recognition Program (6.82 KB); ATT00008.htm; FW: DA's (2.99 KB); ATT00009.htm; Time Line of Events.docx; ATT00010.htm; 90 Day PIP--Reena's

Notes.docx; ATT00011.htm

Sent from my iPhone

Begin forwarded message:

From: "Reena Mathew" < rmathew@santanderconsumerusa.com >

To: "Eldridge Burns" < eburns@santanderconsumerusa.com Cc: "Lisa Vanroekel" < lvanroekel@santanderconsumerusa.com cc: "Lisa Vanroekel" < a href="mailto:lvanroekel@santanderconsumerusa.com">lvanroekel@santanderconsumerusa.com cc: "Lisa Vanroekel" < a href="mailto:lvanroekel@santanderconsumerusa.com">cc: "Lisa Vanroekel" < a href="mailto:lvanroekel@santanderconsumerusa.com">cc: "Lisa Vanroekel" cc: "Lisa Vanroekel" cc: "Lisa Vanroekel@santanderconsumerusa.com cc: "lvanroekel@santanderconsumerusa.com lvanroekel@santanderconsumerusa.com cc: "lvanroekel@santanderconsumerusa.com cc: "lvanroekel@santanderconsumerusa.com <a href="mailto:lvanroekel@santanderconsumerusa.com

Subject: FW: Hello

Hi Eldridge,

Please see below.

Thanks, Reena

From: Reena Mathew

Sent: Tuesday, April 19, 2016 2:49 PM

To: Pamela Blackburn < <u>pblackburn@santanderconsumerusa.com</u>> **Cc:** Lisa Vanroekel < <u>lvanroekel@santanderconsumerusa.com</u>>

Subject: Hello

HI Pam,

I'm sorry to have to bring this up again, but I would like to make a complaint regarding how I have been treated by my direct management team in regards to making false accusations about my performance. The situation started after I informed mgmt. I was pregnant in October/2015 and has escalated ever since. I know you are somewhat familiar with what's happened, but would also like to include a breakdown of the last few months.

First, I was placed on a 30 day PIP in December 1, 2015 without <u>any</u> prior coaching's (which goes against our usual protocol and was given an inaccurate/false timeline a month later) and was then placed on a

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 236 of 377 PageID 1061

90 day PIP in January 15, 2016. Currently, my 90 day PIP ended on April 15, 2016, however, along the way, mgmt. brought issues to my attention for our follow up meetings with information that was inaccurate or completely untrue. This all has continued to snowball even though I have met my workload objectives, have not missed one day being pregnant and have continued to be harshly/critically judged for any work that I complete. I have been here 5.5 years (without ever having a performance issue or complaint) and have never been treated so **poorly** by anyone in this company.

I am currently 8 months pregnant and this has also brought on undue stress. I escalated the issue to upper HR management back in December 2015/January 2016, and some things were looked into/corrected (reinstated my merit/bonus which they were going to initially take away and I received a Mets Expectations), however, the false accusations continue. I cannot in good conscience allow current mgmt. to continue to do this to someone and think it's ok.

I had my 90 day review Friday morning on April 15, 2016 and was taken aback by the information that was incorporated (it reminded me of the timeline all over again). I have attached for your review the initial timeline (please see email titled Timeline of Events) that was given to me a 1.5 months after I was placed on the initial PIP on December 1, 2015 (as you can see the first bullet is a false statement, in addition to others on the document, and I also made upper HR mgmt. aware—please see attachment titled FW: Last Chance to Register for February Monthly Luncheon) and I have also attached the 90 day recap which was given to me on Friday, April 15th (last attachment). I have included my notes in red and have also provided supporting documentation.

Pam, I have stated in the past that I have no issue taking accountability for mistakes I have made or working on areas of opportunity, however, it needs to be done fairly (follow protocol) and accurately (without false information). I have been very disheartened these last few months and cannot believe that Management in HR thinks it is ok to treat someone like this. We are HR and need to be held to a higher standard, follow our own policies/procedures and be ethical in our dealings if we are to set the example for the company.

Thank you for your time and please let me know if I can provide anything additional.

Sincerely,

Reena Mathew

Reena Mathew, PHR

Santander Consumer USA Inc. HR Business Partner

PHONE 214.292.2772

MOBILE 214.364.9136

FAX 214.630.0828

EMAIL rmathew@santanderconsumerusa.com

WEB www.santanderconsumerusa.com

BENEFITS HOTLINE 214.540.2010

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 237 of 377 PageID 1062
This e-mail is covered by the Electronic Communications Privacy Act, 18 U.S.C. Sections 2510-2521. The information contained in this e-mail is confidential and intended only for use of the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this message in error or there are any problems please notify the originator immediately.

The unauthorized use, disclosure, copying or alteration of this message is strictly forbidden. This mail and any attachments have been scanned for viruses prior to leaving sender's company network. Neither the sender nor the sender's company will be liable for direct, special, indirect or consequential damages arising from alteration of the contents of this message by a third party or as a result of any virus being passed on.

Sender's company accepts no liability for the content of this email or its attachments, or for the consequences of any actions taken on the basis of the information provided, unless that information is subsequently confirmed in writing.



March 23, 2016 Meeting Recap: Reena Mathew (HRBP), Yessica Adriano (HRM), Stephanie Elad (HRD)

*Note that Yessica's response was provided during the 90 day recap discussion on April 15

**Reena's notes in red

Attendance — Continues to be good; continue to give enough notification. Agreed

Time Management—Give recap of DA's and investigations moving forward.

Please continue with the specifics of the DA's and investigations handled every week.

Consulting—Expectation of HRBP's is moving towards independent judgment calls; HRBP's are expected to formulate plan at the beginning and recommendation at the end; if additional steps need to be taken, use judgment call; you all said you understood my hesitation due to current situation but stated that is the direction we are moving; also to rely on past consulting and judgment calls—we've been on the same page 90% of the time. If there are escalated issues or if Manager is unavailable, we can go to other HR Managers. Want us to be confident in making decisions. Stephanie then proceeded to ask about the timeline of events regarding the Perfect Attendance proposal numbers. I stated I had sent an email on Friday but that was after I had asked her if she needed them before I left and she had stated yes. We had a lot going on and I wanted to tie up loose ends before I left. Because it was a basic report, I didn't think it would be so hard to retrieve from HRIS and stated we have issues in getting a timely response (and that goes for several of us). Stephanie stated she felt as though she was 'misled' and it was a 'misrepresentation' stating that I had been in contact with HRIS. I said that was not my intention and that what I meant was we've been working on this project back and forth for some time and Paula was aware of this upcoming proposal. That is all I meant from that statement. I sent the email on Friday and we only received a response that next Wednesday after Yessica sent another follow up email after I had informed her I wasn't getting a response (even if it just meant them sending us instructions). HRIS then stated they couldn't pull it and Sabrina and I spoke and she manually filtered the report but wasn't getting the information we needed and then HRIS stated they were able to after that. I even worked during my vacation to get this settled and I also mentioned that this was a project that I took on (after Brad Denetz and I have spoken for some time and Stephanie said I wasn't taking ownership) and it wasn't assigned so I wouldn't not allow this issue to paint me in a negative light. Stephanie mentioned she had concerns and that I wasn't meeting the expectation of an HRBP however I stated that is not what was said in the last meeting (stated I was where I needed to be as an HRBP).

Reena, in regards to the consulting, the expectation has always been that you are able to perform independently in your role. Although I have been providing more oversight as of late, due to the performance issues identified, with your background, experience and tenure with the company, you are expected to perform your job effectively, which means handling most of your tasks without oversight. I am available if you have questions or if you need support with more complex issues.

As it relates to the incident involving the Perfect Attendance Proposal, I wanted to outline the sequence of events: March 9 (3:27pm) – Stephanie sends the proposal to EVP Tony Kutiper, asking him to review and advise if this is something he wants to implement in the call centers.

March 10 (8:25am) – Tony responds and says yes. He also requested additional information, which you responded (9:18am) and said you would provide.

March 11 (4:28pm) – You send an email to Stephanie stating that you will be out of the office the following week and will have the information that Tony requested when you return I said 'if that's ok' at the end of that sentence (Please see Email 1).....that makes a huge difference in the statement. Stephanie stated she would like it by next week and I stated I would get those numbers for her. Again, as I mentioned to Stephanie/Yessica, we had 3 investigations (which is very unusual to have so many in one week) and I was trying to wrap everything up before I left. We had only received the request from Tony Kutiper on Thursday asking if we could provide additional information. I sent an email to HRIS as soon as I heard back from Stephanie on Friday asking if they could pull the report and provide to Mgr/Director while I was gone and never heard back until Wednesday of the following week (after several of us, including myself on Vacation

SC Action Plan Revised 01/2016



followed up with them) <u>Please see Email 2 and 3</u>. It would've been nice if we could've received instructions on how to pull it. It turns out we were given a raw data spreadsheet and information was pulled but then in the end there were discrepancies and HRIS said they would have to rerun the information. Even if I did send an email on Thursday (before I left for vacation) to HRIS, it still would've taken time to receive the information, sort the information, present in a spreadsheet as this is a new and manual process to everyone. A day to turnaround the information would be impossible and that it why I stated I would have everything upon my return so that I could take care of everything and ensure everything looked correct. You also stated "I am partnering with HRIS to assist but wanted to give you a status update". Stephanie replies back (4:46pm) and states she would like to get this information to Tony sooner, preferably the next week. You responded at 4:49 advising that you would ask HRIS to send the information directly to Stephanie and Tony. Stephanie replies at 4:59 stating that she would like the information sent to her, and to me, so that we could review prior to sending to Tony.

March 11 (5:07pm) – You send an email to HRIS requesting the information.

When asked about the timeline of events, your response was that you had been working with HRIS months ago on this project. However, upon further investigation, HRIS does not recall having any conversations with you about this particular report. They did recall you asking if Kronos could be updated to capture this specific information. **This is a completely false statement**; I stated that I had mentioned to HRIS the Perfect Attendance proposal months ago and they were familiar with what the *project looked like and what our thoughts were re: the direction we were going.* We initially wanted to implement it in the Summer of 2015 but Kronos did not have the capabilities and with the new update we were receiving, I was told it was something we could request from Kronos.

In any event, your statement that "you were partnering with HRIS to assist" was misleading and is considered a misrepresentation of the truth. Considering this whole PIP is a misrepresentation of me and my work ethic as well as the truth (placed on a PIP without ANY previous coachings during my tenure) as I have stated this numerous times when this whole issue was being investigated (this is not the first time there are blatant lies as documentation), this is an incredible insult to me and feel as though my words are being twisted to paint me in a negative light.

I don't believe that you prioritized this request properly as the request to HRIS should have been sent much sooner. This ties in with feedback we have provided to you regarding sense of urgency and ownership of your work. This is your project and you are expected to work through the challenges and escalate to your leadership when you are unable to do so. In this case, that didn't happen. In fact, someone on the team who is junior to your position was able to step in and identify issues and help to resolve them, which ultimately led to us being able to provide the report to Tony—False statement; report was provided by HRIS after we had given them pay codes, but I provided the end result. No one assisted me with that. Significant progress was made, in your absence, and none of the issues were surfaced by you. Report was only provided after I followed up, along with Manager, to get the ball rolling. This was while I was out on vacation. Your role in the project was to send the request to HRIS, and then wait for them to send you back the report. When that didn't happen, you sent several emails blaming them and complaining about their response time. Instead, what I would have expected was to ensure that the request was sent more timely, followed up with them to ensure understanding and collaborate to complete the task. I would've but the information was requested for the following week while I was out on vacation. Again, we had three major investigations and I only received the request on Thursday, I apologized for thinking it would be ok to have everything submitted when I returned as it's not something that could be pulled in a day. And yes, as HRIS, I would think that if we are requesting something from an EVP, we would at least get a response. I think that is a reasonable assumption and is not placing blame. If I hadn't followed up during vacation and then escalate to Manager, who knows how long it would've taken to hear back.

When we spoke with you regarding this incident, there was a lot of blame placed on the HRIS team, and at one point you even blamed Tony Kutiper, for not responding promptly. First of all, Tony did respond promptly (within a few business hours). Second of all, Tony is the client, and his response time is not of your concern. Our team is here to provide service to Tony and his team, so we need to prioritize his requests with a sense of urgency. This is a complete lie.

SC Action Plan Revised 01/2016



When/where/what time did this happen? This is made up information and I did not once mention Tony Kutiper's response time nor his name—why would I? I cannot even believe this would be placed in here as it is completely untrue. I would like to know who added this statement.

Since our discussion, another issue has arisen, in regards to the Perfect Attendance Proposal project, that I feel needs to be brought to your attention. On Monday, March 28 at 11:12am, Stephanie sent you an email requesting Talking Points for the program and an updated attendance report. The deadline was EOD that Friday (April 1). Stephanie also requested that you send it to me for review and feedback prior to sending to her. The information was not sent to me until 7:17pm on April 1. This did not meet the deadline that Stephanie sent. You called me at 5:45pm and 6:14pm on April 1. I called you back a little later that evening and you said that you were stuck in an investigation (Associate Brittany) with AVP Jorge Munoz. I reminded you that my direction was that you should complete the Perfect Attendance proposal on Friday and complete the investigation the following Monday. Another false statement—I had taken my children to a Dr's appt that morning and only returned at 11:45am. As soon as I got in you had informed me with Jorge in my office that we had an issue come up and you needed me to look into it right away. We also had a one hour HR call and as soon as you and I spoke and I started the investigation right after. I also reminded you that day and the day before (you did not remind me of anything) that I was going to shut my door to work on the proposal for Stephanie and that you had to review it (this was Thursday). You said that was fine so for me to come in and you to ask me to start on this investigation is contradicting yourself. You knew before you left that I needed to review with you the proposal as I had mentioned it Thursday and Friday and you left while I was behind closed doors as I had been for a good portion of the afternoon and that is why I panicked and called you. I had no idea you would leave without consulting with me knowing I had that due. I stayed till 7:45pm to complete the numbers (which again is a manual process and takes time we had only received the raw data Thursday afternoon; you even stated you would let Stephanie know that we received the data only a couple of days after her initial request on Monday (Stephanie's request was Monday, we received the data Thursday afternoon and we were in all day HR meetings Tuesday, dinner after/Wednesday of that week)—that is after HRIS said they could only get it to us COB Friday and I escalated to you and you intervened to get it by Thursday afternoon). Please see email attachment 4.

Reena, the concern about your ability to make good decisions about how to utilize your time remains of significant concern. I was clear that the deadline to Stephanie was your primary task for Friday. The fact that you chose to spend time on the investigation instead, even after I told you specifically to hold that until Monday (Not true—you asked me to start this right away when I came in Friday) shows that you are continuing not to make good choices regarding how you spend your time, and also that you are not following specific instructions from your immediate supervisor and your director. Several expectations of your role are not being met here including ability to meet deadlines, ability to push back on the business, and ability to manage your time appropriately. The Talking Points should have taken no more then 20-30 minutes to complete (again, all day HR meeting Tues/Wed and Thurs playing catch up and started on numbers which were only provided Thursday afternoon). This was assigned on Monday, and not submitted until after 7:00pm on Friday and was not sent to me prior to going to Stephanie, as she specifically instructed you to do. Stephanie set this deadline because she was scheduled to review this information with Tony and the SVP's on Monday morning. The delay on your part created more work for Stephanie as she did not feel comfortable cascading this document to the SVP's during their scheduled meeting on Monday morning, as I had not had the chance to review and advise. Stephanie's intent was to provide this deliverable to the clients on Monday and she was unable to do so, because you missed your deadline. I did not miss my deadline—the only thing I missed was your review in which we did our best over the phone given the circumstances. Staying close to 8pm on a Friday evening shows good faith effort that I tried my best to get everything completed by EOD.

Since then, the attendance report was submitted but had material errors and had to be sent back. Unfortunately, the information was sent to the business incorrectly because you didn't validate the information prior to sending to Stephanie I in fact validated and let you know and Stephanie know that is a completely new process (I don't claim to be an Excel whiz and unfortunately when I deleted the FMLA/LOA columns, the totals still counted them. I did not know

SC Action Plan Revised 01/2016



Excel would do this. I immediately sent the revised version the next day that took away the one person who may have met the expectations. This was an honest mistake. It is your job to ensure the accuracy of the information you produce before you send it. These types of mistakes causes the business to lose credibility in their HR partners I'm sure they would understand that this is a completely new process (again, which I implemented myself) and mistakes are going to happen along the way.

As it relates to the Brittany investigation, on April 6, you came to me to discuss. During that conversation, I provided you with feedback that you had not done as thorough of a job as needed in regards to this matter Completely false—I IMed you that day (I was WFH that day and we never had any verbal conversations) and asked if you had your notes ready so I could submit my summary to you and you said you didn't and that you would have them Thursday—I then asked if it would be ok to turn in the summary Thursday after I received your notes and you said that was fine. On Thursday, you stated Jorge wanted one more person interviewed and I stated that would be fine and I gave you my notes on Friday after speaking to the associate as she was an afternoon associate, and asked you to speak with 1 additional Associate. Your summary was not submitted to me until April 8, and was not complete as your notes were not attached and you did not provide all of the proper information (i.e. DA history) Yessica, I sent you my notes and asked you to include your part of the notes; I did not know you were going to send to Stephanie right away. In that case, your notes for Brittany would've been missing as well and at that point you should've asked me for all the notes before you sent it. With every previous investigation, I have always sent my notes along with the summary. Reena, it's concerning that this investigation would take a week to complete and that you would need coaching on how to approach the situation, considering your tenure and experience. This is a fairly simple matter to address. This delay has created some concern with the business. Completely false again—I came to you on Wednesday done with interviewing associates and you were not done with your notes and asked if you could give them to me later. You still were not done on Thursday and that is why I sent everything to you on Friday stating 'Could you please fill this part in?' We even met-- you, me and Sabrina Friday afternoon and Sabrina is my witness. I told you during our meeting when you stated we had to be timely with investigations and that Stephanie was questioning why this particular investigation took a week-I even mentioned that I had everything ready on Wednesday and you had not (I smiled at this point letting you know that you who didn't have your part ready) and that you asked me to meet with one more person per Jorge. You even stated, 'Oh that's right'. Please see email 5 and 6.

Finally, to clarify a point in our last meeting (March 8), when I stated that things were progressing well, I was referring to the 2 week period we were discussing. I did not state that meant that your performance was now at a "meets expectations" level. The issues highlighted in your PIP are still of concern, and at this point, you are still not meeting the expectations of an HR Business Partner.

SC Action Plan Revised 01/2016

App.275 SC003547



90 Day Review April 15, 2016

Timeline

01/15/2016: Administer PIP/Action Plan
01/29/2016: 1st Biweekly follow up meeting
02/17/2016: 2nd Biweekly follow up meeting

02/26/2016: 30 Day Review

03/08/2016: 3rd Biweekly follow up meeting 03/23/2016: 4th Biweekly follow up meeting

04/15/2016: 90 Day Review

Attendance

Met Expectations

You have been consistent in providing appropriate notice for requested time off. In most cases, additional hours were worked to offset the time you have left early/came in late.

Time Management/Effective Work Habits

Does Not Meet Expectations

During this 90 day period, we have discussed and provided you examples to illustrate the continued areas of opportunity in this category. We have provided you with feedback regarding:

Providing more detail in the work you submit (time study, weekly recaps)

Submitting work accurately

SC Action Plan Revised 01/2016

App.276 SC003548



- 2 term requests submitted incorrectly, 1 with incorrect data and 1 without investigation summaries attached (Monisha 02/15, Brittany 04/08)—Please see below re: Monisha; Please see above regarding Brittany
- Incorrect data on attendance report (submitted to Stephanie on 04/06)—Please see notes above
- Missing deadlines (missed deadline to Stephanie on attendance talking points/report, Monisha investigation notes)
 - The attendance talking points were assigned by Stephanie on 03/28 with a deadline of 04/01. In her email, Stephanie specifically requests that you have me review the document prior to sending her the final copy. You submitted your documents to Stephanie at 7:17 pm that day, without my review. In a later conversation, you stated you didn't know I was leaving early that day, I advised you I was available all day and did not leave until 4:45 pm. You may have been available but I was working on the investigation you had assigned me. Hence, the prior day 03/31 I had reminded you of this priority and again on 04/01. You did not remind me of anything—I had come to you on 3/31 stating I was going to close my door as soon as I came back from the Dr's appt and I even told you that I needed you to review per Stephanie and that was my priority. The document was sent back, so I could review (several edits had to be made) in order to deliver a finished product to Stephanie
 - O Monisha Investigation- On 02/15 we had a discussion and edits for the document provided to you by Stephanie, she advised to have this completed first thing on the morning of 02/18, it was not received until that afternoon without the edits Edits had to be made, but again, we had to meet with Monisha Hughes Trigg one more time, per you and Stephanie, to see if she would admit to anything else (calling or saying anything to John Leavell or his wife); AVP Mitzie Jefferson is my witness for this meeting.
- Timely follow up (email response to Stephen, completing Brittany investigation timely, reaching out to HRIS timely to complete request from an EVP, DA's being completed within 24 hours)-I have already explained to Stephen why I didn't feel comfortable putting things in writing—this document is a perfect example. Additional false statements being made about my work performance—previous one was the timeline provided much later after the initial 30 day PIP had no documentation attached. *Please see email 7.*
- Thoroughness and Quality of Work (Monisha summary having to be sent back, Brittany investigation, attendance talking points)
 - Monisha summary was submitted without the edits that were provided
 - Brittany investigation was submitted without the investigation summaries, without DA history, and revisions had to be made to the Substantiated and Unsubstantiated categories to reflect what the interview notes reflected
 - The perfect attendance talking points document had to be revised in the following ways in order to be business presentable: inserted introduction, added program objective, included sub topics (objective, eligibility, and rewards), reworded and expanded rules of the program, and changed format/font. Per Stephanie, she said this communication would go out to the associate level and that is how I drafted it. You told me that following Monday, she was going to present it to the Senior Mgmt. and it was for them and that is why we had to make it a little more formal. Miscommunication on mgmt.'s part on who it was going to. Please see email 8.
- Importance of teamwork in completing administrative tasks that come in through the @HR_help inbox. Specifically, DA administration for LEW. In March/April, you entered only 16 DA's into WorkDay, compared to 568 total for the site. This does not meet the expectation to do your share of the work to support the team. This is primarily a Generalist duty and if the Generalist is out, I will always cover. Per previous follow up conversation, you stated you and I had knocked everything out when Generalist was out for a week. Again this is a Generalist duty unless they are extenuating circumstances. If that is the case, I shouldn't be penalized when I ask for assistance with DA's that come through during the week. No one helps me with those and I have asked several times in the past for assistance.

SC Action Plan Revised 01/2016



Also, you were coached on misrepresenting the truth in an email to Stephanie regarding the sequence of events in regards to the attendance report issue—False accusation—I already explained and stated I apologized that you interpreted it that way. You did not know the full history of the conversations HRIS and I have had. That is what I was referring to.

After you having decided that you did not want to continue with the time study, we agreed that you would just provide on a weekly basis (every Friday by 5 pm) a count of the number of DA's handled and investigations conducted. This has occurred regularly. I did not decide to discontinue, you both asked me if it was helpful and I said it actually took more time and took away from my job duties. You ALL decided that I didn't have to do it anymore because it was meant to be helpful and not take time away.

Consulting

Does Not Meet Expectations

For the first 2/3 of the PIP period, Yessica worked with you very closely and provided constant guidance There was never constant guidance—I came to you with status updates and to see if you were good with my recommendations. Even with that, there were some issues, as highlighted in the previous section. Additionally, we asked you on more than one occasion if there were development or training opportunities that you wanted to take advantage of. You declined those offers I haven't declined anything; I haven't had time to do much of anything, however, I even presented you with two Dallas HR courses I wanted to take along with a few Webinars I have signed up for and completed.

During this 90 day period, we have provided you with feedback regarding:

- Ability to push back on the business to ensure that you complete your job tasks/duties/deadlines (Brittany investigation) You asked me to start investigation.
- Lack of accountability for your behaviors (blaming HRIS—valid concerns with follow up/response time, Tony—completely untrue. These things get in the way of us being able to serve our clients effectively.
- Addressing the business regarding feedback that they may have provided regarding your performance. Specifically, asking "who told on me?"—Completely false—you came to me and stated Brad came to you about DA's that weren't completed while we were at the SHRM conference. I sent email to AVP's in advance and they were all ok. *Please see email 9*. I did mention to AVP Sam Akins that if he ever needed anything, to please come to me. Even Brad said it was blown out of proportion and he was only checking on the Rhonda issue and generally asked if the DA's had been done. If I was so bad, why would the SVP/Site Director along with *every single* AVP send me YEI points stating how much they enjoyed working with me in the last year? When I brought this up in my 90 day meeting, Stephanie responded that YEI points received from our SVP/Site Director are 'irrelevant' when in fact, this is what speaks the most to our performance as Partners to the business. This is unprofessional and negatively impacts your ability to provide consulting services to your client group.

Additionally, we received feedback from the business clients regarding your performance and how you interact with them. The comments we received are as follows:

- Limited interactions, but it has been better since January. I'd rather just go to someone else on the HR team to get it done right. They are always helpful and on point.
- I am getting DA's within 2 days. I never get it within 24 hours though, which is what I thought the expectation was.
- I enjoy working with her but notice that with difficult conversations she is timid and struggles. She asked me to sit in on a conversation and when it got difficult she said that I would take over. This wasn't my Associate and I was unprepared.

SC Action Plan Revised 01/2016



- She doesn't like making decisions without checking with her manager. She isn't confident when dealing with issues. She is scared to make decisions.
- I had to sit in on a term that Reena was supposed to handle. Reena got flustered and turned it back to me to handle. It's obvious that she can't handle conflict.
- She has had to ask for an extension (beyond 2 days) for a DA.
- I'm much more comfortable and confident working with others on the HR team because they respond timely and are confident in their decision making process.
- She is very nice. Just don't ask her for anything.

As a reminder, it is not appropriate for you to go back to the business to discuss this feedback. In previous conversations, you mentioned Jorge, Mitzie and Greg gave you feedback regarding issues and turnaround time. If this is the case, I would like something in writing because I believe this to be false information and a misrepresentation of me and the truth as this contradicts everything I was ever told by them in writing via YEI. You also won't inform me where this information came from and who said it in what context so therefore along with other inaccuracies in this document and the previous 'timeline' that was provided me, I find it faulty. It is my belief that this information was presented in a negative light and negative information was therefore given. I have never had any issues, prior to this, (with anyone complaining) with any of my Business Partners in the 5.5 years here at SC.

At this point, you have not shown the ability or capacity to provide effective consulting services to the AVP group.

As we conclude the PIP process, it is important to state that you are still failing to meet the expectations for the HR Business Partner role.

Associate Signature	Discussion Date
Manager Signature	Director Signature

SC Action Plan Revised 01/2016

App.279 SC003551

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 246 of 377 PageID 1071
May.04.2016 07:59 AM PhilipsReens Mathew 9724011826 PAGE. 2/ 2

EEOC Form 5 (11/06)						
CHARGE	OF DISCRIMINATION	Charge	Presented To	: A	gency(ies) Charge No(s):
This form is diffeoted by the Statement and other	Privacy Act of 1974. See enclosed Privacy Act Information before completing this form.	X	FEPA EEOC 43	30. 2	201	6.0263
	Texas Workforce Commission	lu-				and EEOC
- 1	State or local Age			_		
lame (Indicate Mr., Ma., Mrs.)		0.00	Home Phone (Code)	Date of Birth
lls. Reena Mathew			(214) 417-0821			10/27/1976
Ireel Address	City, Sinte and ZIP Code					
355 Valley Vista Dr.	Irving, TX 75063					
lemed is the Employer, Labor Orb Discriminated Against Me or Other	unization, Employment Agency, Apprenticesh a. (If more than two, list under PARTICULAR)	ip Committee, or : 9 below.)			nt Ageno	y That I Balleve
lame			No. Employoca, i	Vembers		No. (Include Area Code
Santander Consumer,U			1000+	DE	. A	89)-223-4227
Street Address	***	and ZIP Code		u # F		LIAC
2701 Highpoint Oaks Dr	. Lewisy	rille, TX 7506				
teme			Na. Employoss, 1	Wembers	MAPPO	No Tracking Area Code
Street Address	City, State	and ZIP Code	C	PPOR	JAL E ITUNI	MPLOYMENT
HISCRIMINATION BASED ON (Check	amenajaja hAv/031)		DATE	(8) DISCRI	RHINATIC	S. FOURTERET
1804 WILLIAM ISSUED ON TORIES		•		Earlest		Latest
RACE COLOR	X SEX RELIGION	NATIONAL ORIG	in '	10/201	5	04/19/2016
X RETALIATION	AGE DISABILITY GE	ENETIC INFORMATI	ON			
X OTHER (Special)	Pregnancy			X	рипиос	ING ACTION
HE PARTICULARS ARE (If additional	paper is needed, eltach extre ahout(s)):					200
pregnancy and terminate October 30, 2015 I infer Prior to informing Santal performance evaluations. December 1, 2015, I was cause and raised my condenied my merit increase plan, I was placed on a result of my pregnancy acrutiny as compared to Statement of Discrimination.	intander Consumer USA discrimined my employment in retaliation fromed Santander Consumer USA inder Consumer USA inder Consumer USA of my pregnos nor had any disciplinary action less placed on a thirty-day performancems in regards to the disparate and annual bonus and upon the second, ninety-day performance if y and my concerns raised to Humbother employees, in an effort to enation: I believe I have been discrete for the content of the co	or concerns I IR Manager ' ancy, I had nevied against nce improver treatment to a expiration o improvement an Resource effectuate my	raised to H Yessica Adr ever receive ment plan w Human Ra f my first pe plan withou s, I was sub termination	uman filano thed any ver, sho ithout a source if cause oldered it.	Resourat I wanted to poor to p	rces. On as pregnant. work sereafter, on aming or as initially serovement sequently, as reased in violation of
All advise the agencies if I change m exceptes fully with them in the proce	EEOC and the State or local Agency, If any, It may address or phone number and I will peaking of my charge in accordance with their	NOTARY - When necessary for State and Local Agency Regulterants				
deciare under penalty of perjuly to	hat the above is true and correct.	i swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and boiler. BIGNATURE OF COMPLAINANT SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)				
5/4/16	R9Mathew_					
Date	Charging Party Signature					

REENA MATHEW	§	
	§	
VS.	§	EEOC CHARGE NO. 450-2016-02634
	§	
SANTANDER CONSUMER USA INC.	§	

POSITION STATEMENT OF SANTANDER CONSUMER USA INC.

Santander Consumer USA Inc. ("Santander") categorically denies Reena Mathew's ("Mathew') allegations in her Charge of Discrimination ("Charge"). In her Charge, Mathew claims that she was discriminated against because of her gender and pregnancy, and was retaliated against for making a complaint of discrimination. Mathew's claims are based on a fantasy in which she was a model employee, and they ignore the reality of her own poor job performance. The evidence demonstrates that Mathew consistently failed to meet expectations in her job performance. This poor performance led to her supervisors placing her on a Performance Improvement Plan ("PIP"). However, despite receiving extensive coaching and direction at biweekly meetings to discuss her progress during her PIP, Mathew failed to demonstrate necessary improvement. Accordingly, Mathew's employment was terminated due to her habitual poor performance.

I. FACTUAL BACKGROUND

A. Santander

Santander is a full-service, technology-driven consumer finance company focused on making and servicing automobile loans.² Santander is headquartered in Dallas, Texas.³

¹ See Reena Mathew's Charge of Discrimination, Charge No. 450-2016-02634.

² Santander Consumer USA Inc., Overview, http://www.santanderconsumerusa.com/about/overview (last visited January 21, 2016).

³ *Id*.

1. Equal Opportunity Employer

Santander is an equal opportunity employer, committed to providing equal opportunity to all persons regardless of race, color, sex, creed, gender (including identity and expression), religion, national origin or ancestry, ethnicity, age, marital status, registered domestic partner status, sexual orientation, disability, physical or mental disability, medical condition including genetic characteristics, veteran status or any other legally-protected basis.⁴

2. Anti-Harassment and Anti-Discrimination Policy

In addition to equal opportunity policies, Santander has an Anti-Harassment and Anti-Discrimination Policy.⁵ The policy prohibits unlawful discrimination or harassment of any kind.⁶ Furthermore, the policy outlines a complaint procedure for associates who feel they have experienced job-related harassment.⁷ If an associate feels that he/she has been treated in an unlawful, discriminatory manner, he/she should promptly report the incident to his/her manager and/or Human Resources.⁸ Managers are required to immediately report any such claims to Human Resources as well.⁹ Human Resources then investigates the matter, takes the appropriate action if necessary, and is mindful to keep complaints confidential to the extent possible, consistent with Santander's need to conduct the investigation and take any necessary action.¹⁰ If an associate feels that he/she is experiencing any job-related harassment from a member of Human Resources, he/she is instructed to go immediately to Santander's Legal Department.¹¹

⁴ See Exhibit A.1, excerpts of the Santander Consumer USA Inc., Associate Handbook, 5-6 (2013) [hereinafter Santander Handbook], Exhibit A; Affidavit of Yessica Perez, ¶3.

⁵ Exhibit A, Affidavit of Yessica Perez, ¶4.

⁶ *Id*.

⁷ *Id*.

⁸ *Id*.

⁹ *Id*.

¹⁰ *Id*.

¹¹ *Id*.

Santander's Anti-Harassment and Anti-Discrimination Policy also specifically states that retaliation is prohibited by Santander's policies and the law. ¹² Associates are informed that if they think they have been retaliated against, they may file a complaint with the appropriate agency and that the nearest office can be located at www.eeoc.gov. ¹³

B. Mathew's Employment With Santander

Mathew joined Santander in January 2011 as a Human Resources ("HR") Business Partner at Santander's Lewisville, Texas location. In this role, Mathew was responsible for, among other things, managing employee relations issues, processing employee disciplinary actions, and conducting investigations into employee conduct as necessary. ¹⁴ As an HR Business Partner, Mathew originally reported to HR Manager Angelina Hullum. ¹⁵

1. Mathew Performed Poorly while Reporting to Ms. Hullum

While reporting to Ms. Hullum, Mathew exhibited ongoing performance deficiencies. ¹⁶ Specifically, Ms. Hullum noted the following incidents in which Mathew's performance was either brought into question or failed to meet expectations:

• April 9, 2015: Mathew submitted a monthly recap that illustrated her lack of work. The recap reflected that Mathew had participated in only two side-by-side meetings with managers and only four jumpstarts during the month. Mathew also failed to indicate the number of meetings she had that month with business leaders. It was expected that an HR Manager such as Mathew should participate in significantly more than two side-by-side meetings with managers over the course of a month. ¹⁷

¹² *Id.* at ¶5.

¹³ *Id*.

¹⁴ *Id.* at ¶7.

¹⁵ *Id.* at ¶10.

¹⁶ *Id*.

¹⁷ *Id*.

- May 18, 2015: Mathew submitted a monthly recap which reflected the fact that she did not attend any jumpstarts for the month, did not conduct any trainings, and the number of meetings with business leaders was again not included. 18
- July 1, 2015: Mathew asked for permission to leave work early for a doctor's appointment, of which she had not previously advised. ¹⁹
- July 2, 2015: Ms. Hullum asked Mathew to correct onboarding discrepancies in the Workday program, to which Mathew responded by asking if this project could be assigned to another department.²⁰
- July 10, 2015: Ms. Hullum asked Mathew to support a department at another Santander office location due to a staff shortage and an unbalanced workload identified among the HR department, to which Mathew asked for assistance, noting that she felt overwhelmed with her current duties.²¹
- August 13, 2015: Mathew's monthly recap reflected that she held only one side-by-side meeting, attended three jumpstarts, and she had over 10 meetings with business leaders, and recapped only one training that she had with a manager.²²
- August 23, 2015: Mathew texted Ms. Hullum to advise her that she would arrive late the next day, requiring Ms. Hullum to rearrange her schedule so that she could provide coverage for the HR department in Mathew's absence. ²³
- July-August 2015: Mathew complained to Ms. Hullum that her workload was heavy. Ms. Hullum responded by asking her to prepare a time study so that she could pinpoint how Mathew was allocating her time. The first time study submitted by Mathew did not include necessary specifics. As a result, Ms. Hullum had to ask Mathew to provide more specification, which she ultimately did in a revised time study.²⁴

¹⁹ *Id*.

¹⁸ *Id*.

²⁰ *Id*.

²¹ *Id*.

²² *Id*.

²³ *Id*.

²⁴ *Id*.

- **July-August 2015:** Ms. Hullum had to continually remind Mathew to work her full shift and to provide sufficient notice when requesting to leave early. ²⁵
- **July-August 2015:** Ms. Hullum advised Mathew that it was important that she submit disciplinary actions to the business in a timely manner and informed Mathew that she needed to assist the HR Team by entering disciplinary actions into the computer system, because everyone needed to assist with the workload. ²⁶
- **July-August 2015:** Mathew failed to timely finalize pending disciplinary actions and process terminations, requiring that Ms. Hullum regularly step in to complete these assignments. ²⁷

2. Mathew is Ranked Last Among all Santander HR Business Partners

In early 2015, Santander's HR Managers met to discuss the HR Business Partners whom they supervised ("HR Business Partner Evaluation Meeting"). ²⁸ In this meeting, the HR Managers ranked each of Santander's HR Business Partners. ²⁹ During this ranking process, Mathew was ranked last as a result of her poor performance. ³⁰

3. Mathew Continues to Perform Poorly while Reporting to Yessica Perez

On September 1, 2015, Yessica Perez took over the HR Manager position at Santander's Lewisville, Texas office, and became Mathew's direct supervisor.³¹ As she was present at the HR Business Partner Evaluation Meeting, Ms. Perez was aware that Mathew had previously been ranked last among all of Santander's HR Business Partners.³² Additionally, shortly after Ms. Perez began to supervise Mathew, Ms. Hullum shared with Ms. Perez many of the incidents

²⁵ *Id*.

²⁶ *Id*.

²⁷ *Id*.

²⁸ See id. at $\P8$.

²⁹ *Id*.

³⁰ *Id*.

 $^{^{31}}$ *Id.* at ¶6.

 $^{^{32}}$ *Id.* at ¶8.

in which Mathew's performance did not meet expectations while she was reporting to Ms. Hullum.³³

Despite Mathew's history of poor performance, Ms. Perez wanted to give Mathew a clean start under her leadership.³⁴ For that reason, when Ms. Perez started to supervise Mathew, she had one-on-one meetings with Mathew.³⁵ During one of those meetings, Ms. Perez discussed her concerns about Mathew's past performance and encouraged her to seek improvement.³⁶

Unfortunately, Mathew's performance did not improve after Ms. Perez began to supervise her, despite Ms. Perez's efforts to coach her.³⁷ Rather, Mathew regularly failed to meet performance expectations, as demonstrated in the following incidents:

- September 3, 2015: Mathew requested on this Thursday to take off half of the following day. Ms. Perez advised Mathew that she could leave early the next day, but she needed to provide greater notification for future requests, and she needed to do her best to work most of her shift the following day. On the following day, Mathew arrived at 9:00 a.m., showing no interest in coming to work early, and she still left early at 2:00 p.m. 38
- **September 17, 2015:** Mathew again provided Ms. Perez with last-minute notification that she was going to leave early, this time informing Ms. Perez that she needed to leave early that same day. ³⁹
- **September 28, 2015:** Mathew informed Ms. Perez that she felt overwhelmed with her workload. Ms. Perez informed her that the HR Business Partner role requires a high level of efficiency. ⁴⁰

 $^{^{33}}$ *Id.* at ¶10.

 $^{^{34}}$ *Id.* at ¶9.

³⁵ *Id*.

³⁶ *Id*.

 $^{^{37}}$ *Id.* at ¶11.

³⁸ *Id*.

³⁹ *Id*.

⁴⁰ *Id*.

- October 12, 2015: Mathew again discussed her workload with Ms. Perez. When Ms. Perez asked her what was consuming her time, she did not provide Ms. Perez with a quantified response. Rather, Mathew asked that someone be assigned to assist her with a project in which she had been instructed to create an investigation checklist.⁴¹
- October 29, 2015: Ms. Perez was informed by a business client that Mathew had not completed 10 disciplinary actions that were submitted to her. This surprised Ms. Perez because completing a disciplinary action is not difficult or time-consuming. Indeed, completing a disciplinary action should take an HR Business Partner like Mathew no more than five minutes. When Ms. Perez asked Mathew about the 10 disciplinary actions outstanding, she told Ms. Perez that she was behind and had asked the Assistant Vice Presidents, their business clients, to give her until that Friday to complete them. Ms. Perez responded by telling Mathew that disciplinary actions are time-sensitive, and if she is ever behind in completing them, she needs to let her know.⁴²
- October 29, 2015: Mathew again provided last-minute notification that she would miss work. Specifically, she informed Ms. Perez that she would be arriving late the next day. This late notice required Ms. Perez to rearrange her schedule to provide coverage for the site. Mathew then arrived at the office the next day at noon, missing an entire half-day of work.⁴³
- November 6, 2015: A Santander HR Director, Stephanie Elad, provided Mathew with specific instructions regarding how to respond to what appeared to be an invalid bereavement leave request made by a Santander associate. Ignoring the specific instructions that Ms. Elad provided to her, Mathew took it upon herself to expend unnecessary time and resources handling what should have been a simple response.⁴⁴
- November 9, 2015: Ms. Perez provided Mathew with feedback regarding what appeared to Ms. Perez to be poor timemanagement on her part. Ms. Perez specifically addressed how Mathew should have followed Ms. Elad's instructions regarding the bereavement request, rather than expending unnecessary time addressing that issue.⁴⁵

⁴¹ *Id*.

⁴² *Id*.

⁴³ *Id*.

⁴⁴ *Id*.

- **November 16, 2015:** Mathew provided Ms. Perez with same-day notification that she needed to leave early, and asked for assistance with a project. In her absence, the HR team had to work late to cover Mathew's workload. 46
- **November 17, 2015:** Ms. Perez coached Mathew and again reminded her of the importance of providing advance notification when wanting to leave early, noting how one team member's absences impact the entire team. Ms. Perez advised Mathew that the team had to come in early and stay late to cover her workload when she had left early the day before.⁴⁷
- November 17, 2015: Mathew informed Ms. Perez that she again felt overwhelmed with her workload. When Ms. Perez asked her what was consuming her time, she informed Ms. Perez that she had to complete five disciplinary actions, fill out forms for seven talent acquisitions, and respond to e-mail messages, and she was just busy overall. Ms. Perez found Mathew's complaint unmerited, as Mathew had the lightest workload among all of HR Business Partners who reported to Ms. Perez. Additionally, Mathew's complaint that she had five disciplinary actions was inconsequential, as each of those should take at most five minutes to complete. Likewise, her seven talent acquisitions should take two to three minutes each to complete. ⁴⁸
- **November 20, 2015:** Mathew informed Ms. Perez that she felt she was extremely busy and needed help with her workload. She asked Ms. Perez if another HR Business Partner, Hortensia Perez, could assist her with her workload. Ms. Perez granted her request, and Hortensia Perez took over a pending investigation that was originally assigned to Mathew.⁴⁹
- November 23, 2015: Despite receiving an employee's notice of resignation on Saturday, November 21, 2015, Mathew failed to process the termination timely. Ms. Perez therefore had to process the termination in the afternoon of November 23, 2015. Upon Ms. Perez's review, it came to her attention that the employee who resigned had previously filed a complaint against her manager, which Mathew had investigated. Upon reviewing the investigation, Ms. Perez learned that the complaining employee alleged that she could not trust her Assistant Vice President ("AVP") because the AVP was good friends with the

⁴⁶ *Id*.

⁴⁷ *Id*.

⁴⁸ *Id*.

⁴⁹ *Id*.

manager about whom the complaining employee was making allegations. When Mathew had assumed the responsibility of conducting the investigation, she obviously ignored the employee's allegation, demonstrated by the fact that Mathew interviewed the complaining employee and the AVP together. Mathew then concluded that none of the complaining employee's complaints was substantiated.⁵⁰

After learning about the inadequacies of the initial investigation conducted by Mathew, Ms. Perez conducted her own investigation, which resulted in substantiating some of the allegations made by the complaining employee. When discussing the situation with her, Mathew informed Ms. Perez that she (1) did not read the e-mail message sent by the complaining employee in its entirety, and (2) did not believe the complaining employee during the investigation. In response, Ms. Perez reprimanded Mathew, informing her that she must always investigate complaints with an open and fair mind.⁵¹

- **November 24, 2015:** Mathew again complained about her workload, asking that someone assist her with a pending project. 52
- November 25, 2015: Mathew again provided Ms. Perez with a same-day notification that she would be absent for part of the workday. Ms. Perez advised her, once again, that last-minute notifications like this one places a burden on the other members of the team, who must pick up her workload in her absence.
- Week of December 12, 2015: Ms. Perez was informed that a Vice President ("VP") and several AVPs were concerned with the timeliness of an investigation being conducted by Mathew, as well as how she was conducting the investigation. They felt that Mathew had already reached a conclusion prior to looking into the matter at hand. Accordingly, they asked Ms. Perez to assign a different HR representative to the matter, as they no longer trusted Mathew's judgment.
- Week of December 18, 2015: Ms. Perez received negative feedback regarding Mathew's work performance from Santander's senior leadership team. Ms. Perez provided Mathew with constructive criticism and coached her on how to improve her performance, consistent with the feedback that Ms. Perez had received from Santander's senior leadership team. After receiving

⁵⁰ *Id*.

⁵¹ *Id*.

⁵² *Id*.

this constructive criticism from Ms. Perez, Mathew approached members of Santander's senior leadership team to question them about the negative feedback that they had provided to Ms. Perez about her. The senior leadership team then came to Ms. Perez to inform her that Mathew had questioned them, and told Ms. Perez that they felt uncomfortable and surprised by Mathew's approach.⁵³

• **December 28, 2015:** Santander experienced a payroll issue that required an HR professional from every location to assist in resolving the issue. Ms. Perez asked Mathew to work on this issue. Mathew became very nervous and continually approached Ms. Perez to ask how to handle each step. Therefore, Ms. Perez had to call Sabrina Boyd, an HR Generalist, to ask her to come in on her day off to handle the payroll issue. Ms. Boyd arrived at the office, took over the payroll issue, and worked to find a resolution without difficulty. 54

4. Mathew is Placed on a Performance Improvement Plan

Due to Mathew's ongoing performance issues, Ms. Perez consulted Ms. Elad about next steps regarding Mathew.⁵⁵ Ms. Elad then consulted with her supervisor, Pamela Blackburn, Executive Vice President of HR.⁵⁶ Although Ms. Elad recommended that Santander explore the possibility of offering Mathew a severance agreement to leave, Ms. Blackburn denied that recommendation.⁵⁷ Rather, Ms. Blackburn suggested that Ms. Elad and Ms. Perez place Mathew on a Performance Improvement Plan ("PIP") to provide her with another opportunity to improve her performance.⁵⁸

Accordingly, on January 15, 2016, Ms. Elad and Ms. Perez placed Mathew on a PIP, and provided her with a 90-day action plan.⁵⁹ In this PIP, they identified performance standards for Mathew's job, along with a description of how her performance to date had failed to meet those

⁵³ *Id*.

⁵⁴ *Id*.

⁵⁵ *Id.* at ¶12.

⁵⁶ *Id*.

⁵⁷ *Id*.

⁵⁸ *Id*.

⁵⁹ *Id.* at ¶13.

standards.⁶⁰ The 90-day action plan indicated three areas of focus: attendance; time management/effective work habits; and consulting.⁶¹ Ms. Elad and Ms. Perez then provided Mathew with tasks associated with each of these areas of focus, along with a description of any support or resources that were available to assist her in making the necessary improvements to her performance.⁶² For example, they offered to provide Mathew with additional training on a number of topics, and asked her to request the training by February 5, 2016.⁶³ Additionally, in light of Mathew's continual complaints that her workload was too heavy to handle, they reassigned the work associated with Santander's 8585 location to another member of the team.⁶⁴ Finally, they informed Mathew that she would have biweekly reviews with Ms. Perez to discuss her performance in each of the areas of focus.⁶⁵

5. Mathew Continues to Perform Below Expectations

On January 29, 2016, Ms. Perez met with Mathew to discuss her performance at a first biweekly follow-up meeting.⁶⁶ Mathew noted that she had been properly providing Ms. Perez with 48 hours'-notice before taking time off, which met Ms. Perez's expectations as to the focus area of attendance.⁶⁷ Ms. Perez and Mathew then discussed Mathew's time study, in which she had documented what she did throughout the day and how much time she devoted to each item.⁶⁸ Ms. Perez reminded Mathew that when she received a project, it was important to respond

⁶⁰ *Id*.

⁶¹ *Id*.

⁶² *Id*.

⁶³ *Id*.

⁶⁴ *Id*.

⁶⁵ *Id*.

⁶⁶ *Id.* at ¶14.

⁶⁷ *Id*.

⁶⁸ *Id*.

timely.⁶⁹ Further, if she found herself unable to complete an assignment on time, she needed to provide an update or explanation of what occurred, along with a new estimated time of completion.⁷⁰

During the January 29, 2016 meeting, Ms. Perez asked Mathew if she would like to attend any type of class to assist her in meeting her PIP objectives, and asked her to identify any courses she would like to attend no later than February 5, 2016.⁷¹ Mathew responded by telling Ms. Perez that if she came across any classes she wanted to take, she would let her know.⁷²

During the course of the next two weeks, Mathew failed to fully meet Ms. Perez's expectations in completing her work on a timely basis, and in following instructions.⁷³ For example, in one instance, Ms. Elad had instructed Mathew to eliminate specific information from an investigation report.⁷⁴ Yet, the investigation report submitted by Mathew contained the very information that Ms. Elad had asked her to not include.⁷⁵ Additionally, the deficient report was submitted late.⁷⁶

Accordingly, on February 17, 2016, Ms. Elad and Ms. Perez met with Mathew to further discuss her performance during a second biweekly follow-up meeting.⁷⁷ In this conversation, Ms. Elad and Ms. Perez conveyed their observations that Mathew was still not completing her work on a timely basis, and that she had failed to follow instructions regarding employee investigations.⁷⁸ Ms. Elad and Ms. Perez coached Mathew regarding their expectation that she timely complete her work and that she follow instructions when completing employee

⁶⁹ *Id*.

⁷⁰ *Id*.

⁷¹ *Id.* at ¶15.

⁷² *Id*.

⁷³ *Id.* at ¶16.

⁷⁴ *Id*.

⁷⁵ *Id*.

⁷⁶ *Id*.

⁷⁷ *Id.* at ¶17.

⁷⁸ *Id*.

investigations.⁷⁹ Ms. Elad and Ms. Perez then further analyzed Mathew's recent failure to follow instructions when she submitted the report containing the very information that Ms. Elad asked her to remove.⁸⁰ They also pointed out that Mathew submitted the (deficient) report after the deadline.⁸¹

Also at the February 17, 2016 meeting, Ms. Elad and Ms. Perez asked Mathew to provide them with more detail when identifying for them how she was utilizing her time. ⁸² In particular, they asked that she identify the number of disciplinary actions and investigations that she completes each week, the process that she follows to intake disciplinary actions, and descriptions of other tasks that she completes throughout the week. ⁸³ This was necessary because Mathew continued to complain, in the meeting, that her workload was too heavy, despite the fact that she had one of the lightest, if not *the* lightest, workload of any of Santander's HR Business Partners. ⁸⁴

After the February 17, 2016 meeting, Ms. Perez asked Mathew to provide her with a written summary detailing their meeting. Ms. Perez made this request to ensure that Mathew understood and grasped the key takeaways from their meeting. This practice is not uncommon when administering a performance improvement plan. 87

⁷⁹ *Id*.

⁸⁰ *Id*.

⁸¹ *Id*.

⁸² *Id.* at ¶18.

⁸³ *Id*.

⁸⁴ *Id*.

⁸⁵ *Id.* at ¶19.

⁸⁶ *Id*.

⁸⁷ *Id*.

Mathew provided to Ms. Perez a very cursory outline of their conversation, which fell below Ms. Perez's expectations. ⁸⁸ This outline did not even note the extensive coaching that Ms. Elad and Ms. Perez provided to Mathew regarding timeliness of her work and following instructions when conducting an investigation. ⁸⁹

Despite the coaching that Ms. Elad and Ms. Perez provided regarding timely submitting projects, Mathew continued to fail to timely meet deadlines. ⁹⁰ This untimeliness was not only burdensome to Ms. Perez; but also, it impacted the business clients whom they serve. ⁹¹

Ms. Perez also found that, while Mathew was continuing to work on employee investigations as instructed, she was asking Ms. Perez to direct her in her own investigations far more frequently than someone at Mathew's level should have been. While Ms. Perez appreciated that Mathew was trying to ensure that she did not make any mistakes, Ms. Perez was constantly interrupted by Mathew, each time taking Ms. Perez away from whatever she was working on, to answer questions about investigations that she had expected Mathew to know. Ms. Perez was overwhelmed by these unnecessary interruptions. As a result of these interruptions, Ms. Perez was far less productive than she could otherwise be in her own job duties.

⁸⁸ *Id.* at ¶20.

⁸⁹ *Id*.

⁹⁰ *Id.* at ¶21.

⁹¹ *Id*.

⁹² *Id.* at ¶22. ⁹³ *Id.*

⁹⁴ *Id*.

⁹⁵ *Id*.

On February 26, 2016, Ms. Elad and Ms. Perez met with Mathew to provide her with a 30-day review. 96 In this meeting, Ms. Elad and Ms. Perez again focused on Mathew's need to improve on her time-management and effective work habits. 97 In doing so, they discussed a recent instance when Mathew failed to submit the information requested of her by the deadline, and how her untimeliness impacted the business that they serve. 98

Also at this February 26, 2016 meeting, Ms. Elad and Ms. Perez discussed with Mathew that she needed to take more initiative when conducting investigations. ⁹⁹ In particular, they discussed how Mathew had needlessly interrupted Ms. Perez in her work, prior to performing each of the four investigations that she conducted over the past 30 days. ¹⁰⁰ Ms. Elad and Ms. Perez told Mathew that they expected her to demonstrate more proficiency and confidence in conducting these investigations, and that Ms. Perez would remain available for consultation as needed. ¹⁰¹ They further noted that, consistent with Mathew's PIP, they had offered her training opportunities, in which Mathew had not even expressed any interest. ¹⁰²

Unfortunately, Mathew did not grasp Ms. Elad and Ms. Perez's instruction that she should demonstrate more proficiency and confidence in conducting investigations. Rather, she continued to go to Ms. Perez seeking guidance at, what seemed to Ms. Perez, every juncture during Mathew's ongoing investigations. 104

⁹⁶ *Id.* at ¶23.

⁹⁷ *Id*.

⁹⁸ *Id*.

⁹⁹ *Id.* at ¶24.

¹⁰⁰ Id.

¹⁰¹ *Id*.

¹⁰² *Id*.

¹⁰³ *Id.* at ¶25.

¹⁰⁴ *Id*.

Accordingly, on March 8, 2016, during Ms. Elad and Ms. Perez's third biweekly follow-up meeting with Mathew, they noted that Mathew asked for guidance from Ms. Perez every step of the way while conducting investigations. ¹⁰⁵ They told her that it was their expectation that Mathew would be able to make sound judgment calls on her own, and that she would begin to move toward managing her investigations on her own without constantly asking Ms. Perez for guidance. ¹⁰⁶ In this meeting, they also recognized that Mathew had made some improvements in handling administrative tasks and in being more thorough in investigations. ¹⁰⁷

Three days later, on Friday, March 11, 2016, Mathew engaged in behavior which Ms. Perez believe exemplified her poor time-management skills and called into question her integrity. Specifically, Mathew was working on a project related to rewarding perfect attendance for Santander associates. As part of that project, Mathew sent an e-mail message to Ms. Elad at 4:28 p.m., in which she told Ms. Elad that she was "partnering" with another department, HRIS, to obtain specific data related to the project. In this e-mail message, Mathew told Ms. Elad that she wanted to provide Ms. Elad with a "status update" before leaving for vacation that same day. Mathew asked Ms. Elad if it was okay if she sent Ms. Elad the requested data when she returned from her vacation. Ms. Elad responded to this e-mail message minutes later, asking if Mathew could get the data to her earlier, as she wanted to get the data to their business client the next week if possible. Ms. Elad and Ms. Perez later learned that Mathew had not actually "partnered" with HRIS to get the data, as Mathew had

 $^{^{105}}$ *Id.* at ¶26.

 $^{^{106}}$ *Id*.

¹⁰⁷ *Id*.

¹⁰⁸ *Id.* at ¶27.

¹⁰⁹ *Id*.

¹¹⁰ *Id*.

¹¹¹ *Id*.

¹¹² *Id*.

¹¹³ *Id*.

represented in her e-mail message.¹¹⁴ Rather, Mathew did not request the data from HRIS until *after* she received Ms. Elad's e-mail message requesting her to get the data to her by the next week.¹¹⁵

In addition to her poor time-management, Ms. Perez found that Mathew did not improve in conducting and managing her own employee investigations. Rather, despite Ms. Elad and Ms. Perez's continued instruction that she begin to manage her investigations on her own, Mathew continued to constantly seek Ms. Perez's assistance. 117

On March 23, 2016, Ms. Elad and Ms. Perez met with Mathew for their fourth biweekly meeting. In this meeting, Ms. Elad and Ms. Perez expressed their continued expectation that, as an HR Business Partner, Mathew make independent judgment calls when handling investigations. They informed Mathew that they expected her to formulate a plan at the beginning of an investigation, and to then make a recommendation to Ms. Perez at the end of the investigation. They explained to her that, at this point, she was still seeking Ms. Perez's guidance more than they expect for someone at her level. 121

At the March 23, 2016 meeting, Ms. Elad and Ms. Perez also addressed the situation in which Mathew communicated to Ms. Elad that she had "partnered" with HRIS, when in fact she had not yet contacted that department at all. When Ms. Elad and Ms. Perez pointed this discrepancy out to Mathew, she did not accept responsibility for her poor time-management or

¹¹⁴ *Id*.

¹¹⁵ *Id*

¹¹⁶ *Id.* at ¶28.

¹¹⁷ *Id*.

¹¹⁸ *Id.* at ¶29.

¹¹⁹ *Id*.

¹²⁰ *Id*.

¹²¹ *Id*.

 $^{^{122}}$ *Id.* at ¶30.

her misleading communication. 123 Instead, Mathew blamed HRIS for not getting the data to her as quickly as she would have liked. 124

Despite Ms. Perez's continued counseling and coaching, Mathew's performance simply did not improve. 125 Rather, Mathew continued to seek Ms. Perez's guidance more than was appropriate, failed to timely submit work, and Ms. Perez received negative feedback from their business clients regarding Mathew's work for them. 126

6. Mathew Fails to Meet Expectations at her 90 Day Review

On April 15, 2016, Ms. Elad and Ms. Perez met with Mathew to provide her with her 90-day review. 127 During this meeting, they discussed with Mathew her overall performance for the past 90 days, focusing on the three areas of focus that were identified in her 90-day action plan: attendance; time management/effective work habits; and consulting. 128 They informed Mathew that they felt she met expectations as to attendance; but, she failed to meet expectations as to time management/effective work habits and consulting. 129 They identified Mathew's performance failures in the following areas: (1) providing detail in the work she submitted; (2) submitting accurate work product; (3) meeting deadlines; (4) timely following up when working on a project; (5) providing thorough and quality work product; and (6) contributing to the team by completing administrative tasks as needed. 130 They also informed her that they felt she did not meet expectations in her consulting, as exemplified by her (1) failure to push back on the business when necessary to complete her job, (2) demonstrating a lack of accountability for her own behaviors, and (3) inappropriately addressing the business clients after they provided

¹²³ *Id*.

¹²⁴ *Id*.

 $^{^{125}}$ *Id.* at ¶31. 126 *Id.*

¹²⁷ *Id.* at ¶32.

¹²⁸ *Id*.

¹²⁹ Id.

¹³⁰ *Id*.

Ms. Perez with negative feedback regarding her performance, by challenging the feedback the business clients provided to Ms. Perez. 131

Ms. Elad and Ms. Perez concluded the April 15, 2016 meeting by providing Mathew with some feedback they received from the business clients regarding her performance, which included the following:

- Limited interactions, but it has been better since January. I'd rather just go to someone else on the HR team to get it done right. They are always helpful and on point.
- I am getting [disciplinary actions] within 2 days. I never get it within 24 hours though, which is what I thought the expectation was.
- I enjoy working with her but notice that with difficult conversations she is timid and struggles. She asked me to sit in on a conversation and when it got difficult she said that I would take over. This wasn't my Associate and I was unprepared.
- She doesn't like making decisions without checking with her manager. She isn't confident when dealing with issues. She is scared to make decisions.
- I had to sit in on a term that [Mathew] was supposed to handle. [Mathew] got flustered and turned it back to me to handle. It's obvious that she can't handle conflict.
- She has had to ask for an extension (beyond 2 days) for a [disciplinary action].
- I'm much more comfortable and confident working with others on the HR team because they respond timely and are confident in their decision making process.
- She is very nice. Just don't ask her for anything. 132

¹³¹ *Id*.

 $^{^{132}}$ *Id.* at ¶33.

Throughout this meeting, Mathew was defensive and claimed that she was getting picked on for every mistake. ¹³³ Rather than accept responsibility for any of her actions, she blamed Ms. Perez, accusing her of being a bad manager. ¹³⁴ She said that Ms. Perez failed to check her work before sending it to Ms. Elad, did not ensure she met her deadlines, and did not often enough help her or remind her of things. ¹³⁵

7. Santander Terminates Mathew's Employment

As a result of Mathew's ongoing performance issues and her failure to improve her performance despite receiving a 90-day action plan and a PIP, Ms. Elad, Stephen Shaffer (VP of Human Resources Business Partnership), and Ms. Perez decided to terminate Mathew's employment. On April 19, 2016, Ms. Elad and Ms. Perez met with Mathew to inform her that her employment with Santander was terminated because of her ongoing performance issues. 137

8. Mathew is Replaced by a Female Colleague

Mathew was replaced by Ms. Boyd, who had been promoted from the position of HR Generalist. 138 Ms. Boyd has consistently met Ms. Perez's expectations as an Employee Relations Consultant (formerly "HR Business Partner"). 139

C. Mathew's Charge of Discrimination

On or about May 4, 2016, Mathew filed this Charge of Discrimination. ¹⁴⁰ In her Charge, Mathew claims that she was discriminated against because of her gender and pregnancy, and that she was wrongfully retaliated against. ¹⁴¹

¹³³ *Id*.

¹³⁴ *Id*.

¹³⁵ *Id*.

¹³⁶ *Id.* at ¶34.

 $^{^{137}}$ *Id.* at ¶36.

¹³⁸ *Id.* at ¶37.

¹³⁹ I.J

¹⁴⁰ See Reena Mathew's Charge of Discrimination, Charge No. 450-2016-02634.

¹⁴¹ See id.

II. DISCUSSION

Mathew claims that Santander discriminated against her on the basis of her gender and pregnancy when she was placed on a PIP, and that she was then retaliated against when she was terminated for her poor performance. Yet, Mathew presents not one shred of evidence to support these allegations. As explained below, Mathew cannot establish a claim for either discrimination or retaliation, and Santander nevertheless establishes legitimate and nondiscriminatory reasons for placing Mathew on a PIP and for terminating her employment when she failed to meet expectations.

A. The Legal Standard

To prove her discrimination and retaliation claims, Mathew has the initial burden of establishing a *prima facie* case.¹⁴³ Texas federal and state courts routinely apply the burdenshifting analysis for discrimination and retaliation claims that was established by the U.S. Supreme Court in *McDonnell-Douglas v. Green*.¹⁴⁴

Mathew must prove the following to establish a *prima facie* case of gender and/or pregnancy discrimination under Title VII of the Civil Rights Act of 1964, as amended: (1) she belonged to a protected class; (2) she was qualified for the position; (3) she suffered an adverse employment action; and (4) she was replaced by someone outside her protected class or was treated less favorably than other similarly-situated employees outside of her protected class (*i.e.* she must provide an inference of discrimination). ¹⁴⁵

¹⁴² See id.

¹⁴³ McCoy v. City of Shreveport, 492 F.3d 551, 556-57 (5th Cir. 2007) (discrimination and retaliation); Willis v. Coca Cola Enters., Inc., 445 F.3d 413, 420 (5th Cir. 2006) (discrimination); Jespersen v. Sweetwater Ranch Apartments, et al., 390 S.W.3d 644, 654 (Tex. App.—Dallas 2012, no pet.) (discrimination); Crutcher v. DISD, 410 S.W.3d 487, 493 (Tex. App.—Dallas 2013, no pet.) (retaliation).

¹⁴⁴ See, e.g. McCoy, 492 F.3d at 556-57 and Jespersen, 390 S.W.3d at 654 (citing McDonnell Douglas v. Green, 411 U.S. 792, 802-05 (1973) and Reeves v. Sanderson Plumbing Prods., Inc., 530 U.S. 133, 142-43 (2000)).

¹⁴⁵ *McCoy* v. City of Shreveport, 492 F.3d 551, 556-57 (5th Cir. 2007).

To establish a *prima facie* case of retaliation, Mathew must establish the following: (1) she participated in protected activity; (2) her employer took an adverse employment action against her; and (3) a causal connection existed between the protected activity and the adverse employment action. Protected activity is defined as opposition to any practice rendered unlawful by Title VII, including making a charge, testifying, assisting or participating in any investigation, proceeding or hearing under Title VII. 147

If Mathew presents sufficient evidence to establish her *prima facie* case of discrimination and/or retaliation, the burden of *production* shifts to Santander to show a legitimate, nondiscriminatory reason for the adverse employment action. This burden on Santander is one only of production, not persuasion, involving no credibility assessments. 149

If Santander meets its burden of production, Mathew then bears the ultimate burden of proving that Santander's proffered reason is not true but is instead a pretext for the real discriminatory or retaliatory purpose.¹⁵⁰ To carry this burden, Mathew must rebut each legitimate reason articulated by Santander.¹⁵¹ When evaluating whether an employer's decision was a pretext for discrimination or retaliation, the issue is not whether the employer made an incorrect decision, but whether the reason given was true.¹⁵²

B. Mathew Cannot Establish a *Prima Facie* Case of Discrimination

Mathew cannot establish a *prima facie* case of gender or pregnancy discrimination because she cannot establish that: (1) she was subject to an adverse employment action when she received a PIP, (2) she was qualified for the position; or (3) she was replaced by someone outside

¹⁴⁶ *Id.* at 556-57.

¹⁴⁷ Ackel v. National Communications, Inc., 339 F.3d 376, 385 (5th Cir. 2003).

¹⁴⁸ See McCoy, 492 F.3d at 557.

¹⁴⁹ See id.

¹⁵⁰ See id.

¹⁵¹ See id.

¹⁵² Reeves v. Sanderson Plumbing Prods., Inc., 530 U.S. 133, 143 (2000).

her protected class or was treated less favorably than other similarly-situated employees outside of her protected class.

First, Mathew did not suffer an adverse employment action when she was placed on a PIP. It is well established that TCHRA addresses only "ultimate employment decisions;" it does not address "every decision made by employers that arguably might have some tangential effect upon employment decisions." Generally, an adverse employment action involves "hiring, granting leave, discharging, promoting, and compensating employees." Actions such as "supervisor's reprimands, poor performance reviews, hostility from fellow employees, verbal threats to fire, criticism of the employee's work, or negative employment evaluations" do not constitute adverse employment actions. Moreover, requiring that an employee participate in and complete a PIP is not an adverse employment action. Accordingly, because being placed on a PIP is not an adverse employment action, any claim that Santander discriminated against Mathew by placing her on a PIP must fail as a matter of law. 157

Second, Mathew was not qualified for her position as an HR Generalist, as demonstrated by her repeated failures to meet her supervisor's expectations over an extended period of time. Indeed, beginning in April 2015, Mathew's supervisor, Ms. Hullum, noted the ways in which Mathew failed to meet expectations. Then, even after receiving a new manager and a fresh start, Mathew continued to perform poorly, resulting in her new manager placing her on a PIP. 159

Even then, after receiving biweekly feedback and constant instruction, Mathew still failed to

¹⁵³ Anderson v. Houston Community College System, 458 S.W.3d 633, 644 (Tex. App.—Houston [1st Dist.] 2015, no pet.).

¹⁵⁴ *Id*.

¹⁵⁵ *Id*.

¹⁵⁶ See Wesley v. Yellow Transp., Inc., No. 3:05-cv-2266-D, 2008 WL 5220562 at *3 (N.D. Tex. Dec. 12, 2008).

¹⁵⁷ Mathew seems to complaint about not initially receiving a merit increase and annual bonus, which she seemingly admits to ultimately receiving. Obviously, such an allegation would not amount to an adverse employment action. *See generally* Reena Mathew's Charge of Discrimination, Charge No. 450-2016-02634.

¹⁵⁸ Exhibit A, Affidavit of Yessica Perez, ¶10.

 $^{^{159}}$ *Id.* at ¶¶11-13.

adequately perform her job functions. ¹⁶⁰ Indeed, her performance was so poor that the business leaders whom she served complained about her poor performance, some even requesting that another HR professional be assigned to assist them instead of Mathew. ¹⁶¹ Mathew's ongoing poor performance demonstrates the ways in which she was not qualified to perform in the HR Business Partner position. Therefore, because Mathew was not qualified for her position, her claim fails as a matter of law.

Additionally, with regard to her gender discrimination claim, Mathew cannot establish that she was replaced by someone outside her protected class or was treated less favorably than other similarly-situated employees outside of her protected class. As an initial matter, any allegation that Ms. Elad or Ms. Perez discriminated against Mathew on the basis of her gender is perplexing, *given that Ms. Elad and Ms. Perez are both females as well.* Moreover, it is undisputed that Mathew was replaced by Ms. Boyd, also a female. 163

Finally, with regard to her pregnancy discrimination claim, Mathew cannot establish that she was treated less favorably than other similarly-situated employees outside of her protected class. First, any allegation that Ms. Elad or Ms. Perez discriminated against Mathew on the basis of her pregnancy is again baffling, as both Ms. Elad and Ms. Perez are mothers and have been pregnant before themselves. Moreover, Mathew cannot point to a single individual who was similarly-situated to her and was treated more favorably.

 $^{^{160}}$ *Id.* at ¶¶11-34.

¹⁶¹ *Id.* at ¶¶10 and 33.

¹⁶² See generally, Exhibit A, Affidavit of Yessica Perez.

 $^{^{163}}$ *Id.* at ¶37.

¹⁶⁴ *Id.* at ¶35.

Accordingly, because Mathew was not subject to an adverse employment action when she was placed on a PIP, was not qualified for her position, and because she cannot show that she was treated less favorably than other similarly-situated employees outside of her protected class, she cannot establish a *prima facie* case of discrimination.

C. Mathew Cannot Establish a *Prima Facie* Case of Retaliation

Mathew cannot establish a *prima facie* case of retaliation because she cannot show a causal link between her purported engagement in protected activity and the decision to terminate her employment. To show a causal link, Mathew must be able to prove that "but for" her engagement in protected activity, she would have never been terminated. In evaluating the causal link element, the following three factors may be considered: (1) the employee's past disciplinary record; (2) whether the employer followed its typical policies and procedures in dismissing the employee; and (3) the temporal relationship between the protected action and the termination. Quite importantly, Mathew must rely on more than her subjective belief that she was the victim of retaliation to establish a *prima facie* causal link. Here, Mathew cannot satisfy this "but for" causation element.

Mathew alleges in her Charge of Discrimination that she was terminated after she "raised [her] concerns in regards to the disparate treatment to Human Resources." However, Mathew has not and cannot produce one shred of evidence to support this conclusory allegation. Rather, the evidence shows that Mathew had an extensive history of poor performance before she was pregnant and before she could have possibly made any vague allegations of "disparate

¹⁶⁵ See Crutcher, 410 S.W.3d at 494.

¹⁶⁶ See Nowlin v. Resolution Trust Corporation, 33 F.3d 498, 508 (5th Cir. 1994); see also Bacon v. EDS, 219 Fed. Appx. 355, 357 (5th Cir. 2007).

¹⁶⁷ Hanks v. Shinseki, 2010 U.S. Dist. LEXIS 76660, at * 22 (N.D. Tex. July 28, 2010) (citing *Peace v. Harvey*, 207 F. App'x 366, 369 (5th Cir. 2006)).

treatment."¹⁶⁸ Then, despite Ms. Perez's extensive efforts to coach and guide Mathew through a PIP designed to improve Mathew's performance, Mathew failed to correct her poor performance, necessitating her termination. Mathew's complaints that she felt that she was being treated unfairly were not considered in the decisions made with regard to her employment, including the decision to terminate her employment. ¹⁶⁹ Accordingly, because Mathew cannot establish a *prima facie* case of retaliation, her claim fails as a matter of law.

D. Santander Terminated Mathew's Employment Based on Legitimate, Nondiscriminatory Reasons and Mathew Cannot Show Pretext

Despite Mathew's failure to make a *prima facie* showing of discrimination or retaliation, Santander identifies a legitimate, nondiscriminatory reason for its decision to terminate Mathew's employment—her habitual poor performance. Despite Santander's extensive efforts to assist Mathew in improving her performance, Mathew continued to underperform. ¹⁷⁰ Indeed, her work was so deficient that business leaders approached Ms. Perez to inform her that they were unsatisfied with Mathew's performance, and even asked to have another HR professional assigned to assist them. ¹⁷¹ Additionally, Mathew herself regularly complained that she could not handle the workload assigned to her, even though she had one of the lightest, if not the lightest, workload among all of Santander's HR Business Partners. ¹⁷² Accordingly, because Mathew could not perform her job duties effectively, Santander had no choice but to terminate her employment.

¹⁶⁸ Santander is unaware of what, if any, allegations of "disparate treatment" Mathew purports to have made, as alleged in the vague assertion contained in her Charge of Discrimination.

¹⁶⁹ Exhibit A, Affidavit of Yessica Perez, ¶35.

¹⁷⁰ See generally, id. at \P 8-34.

¹⁷¹ *Id.* at ¶¶10 and 33.

¹⁷² *Id.* at ¶18.

Mathew would now be required to demonstrate that Santander's reasons are not true and are, in fact, designed to conceal a discriminatory purpose. However, Mathew can do nothing of the sort. Indeed, she offers nothing to rebut the legitimacy of Santander's nondiscriminatory decision to terminate her employment based on her poor performance. Therefore, Mathew's discrimination and retaliation claims must ultimately fail because she has no evidence of any discriminatory or retaliatory intent by Santander.

III. CONCLUSION

Based on the foregoing, Mathew's allegations of gender and pregnancy discrimination and retaliation are completely unfounded and thus her Charge of Discrimination should be dismissed in its entirety.

¹⁷³ See Jespersen, 390 S.W.3d at 654 (discrimination); Crutcher, 410 S.W.3d at 493 (retaliation).

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 274 of 377 PageID 1099

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION Dallas District Office

207 S. Houston Street, 3rd Floor Dallas, TX 75202-4726 Intake Information Group: (800) 669-4000

Intake Information Group: (800) 669-4000 Intake Information Group TTY: (800) 669-6820 Dallas Direct Dial: (972) 918-3580

FAX: (214) 253-2720 Website: www.eeoc.gov

Dallas District Office San Antonio Field Office El Paso Area Office

February 14, 2022

EEOC Charge No. 450-2016-02634

Reena Mathew 1355 Valley Vista Drive Irving, TX 75063 **CHARGING PARTY**

RESPONDENT

Santander Consumer USA, Inc. c/o Monte K. Hurst, Partner Hallett & Perrin, P.C. 1445 Ross Avenue, Suite 2400 Dallas, TX 75202

DETERMINATION

Under the authority vested in me by the Commission, I issue the following determination as to the merits of the subject charge filed under Title VII of the Civil Rights Act of 1964, as amended ("Title VII").

All requirements for coverage have been met. Respondent is an employer within the meaning of Title VII, and the timeliness and all other jurisdictional requirements for coverage are satisfied.

Charging Party claims that she was subjected to different terms and conditions of employment and discharged because of her sex: female and pregnancy. Charging Party also contends that she was subjected to different terms and conditions of employment and discharged in retaliation for her complaints about discrimination.

During the investigation, the parties were afforded an opportunity to offer evidence in support of their respective positions. The evidence shows that Charging Party joined Respondent in January 2011. Yessica Adriano (Perez) became Charging Party's manager on September 1, 2015. Prior to being under the supervision of Ms. Perez, Charging Party received positive performance reviews from her previous supervisor, Angelina Hullum, with Ms. Hullum giving Charging Party a positive mid-year review. Charging Party received positive feedback from internal and external stakeholders, including a positive comment from Ms. Perez as late as October 23, 2015, for a "job well done," related to a project Charging Party had completed. On or around October 30,

2015, Charging Party verbally informed Ms. Perez of her pregnancy. On December 1, 2015, Charging Party was placed on 30-day Performance Improvement Plan (PIP), which was subsequently removed after Charging Party informed Respondent it would be tough to accomplish. It was determined that a 90-day PIP would be more appropriate, which was to start on January 15, 2016. Ms. Perez completed Charging Party's 2015 Annual Performance Review on February 11, 2016, where Charging Party was rated overall as "Consistently Met Expectations." On April 19, 2016, Stephanie Elad, Director, and Ms. Perez met with Charging Party to inform her that her employment with Santander was terminated because of her ongoing performance issues.

Based on this evidence, the Commission finds that there is reasonable cause to believe that Charging Party was discriminated against because of her sex (pregnancy) when Respondent discharged her from her position.

The Commission issues no finding, at this time, in connection with Charging Party's remaining claims of sex discrimination (female) and retaliation under Title VII.

Upon finding that there is reason to believe that violations have occurred, the Commission attempts to eliminate the alleged unlawful practices by informal methods of conciliation (i.e., settlement). Therefore, the Commission now invites the parties to join with it in reaching a just resolution of this matter. If you wish to participate in conciliation, please email kelly.melton@eeoc.gov, within 10 days from the date of this Letter of Determination.

When the Respondent declines to enter into conciliation discussions, or when the Commission's representative for any reason is unable to secure a settlement acceptable to the Commission, the Commission shall so inform the parties in writing and advise them of the court enforcement alternative available to the Charging Party, aggrieved persons and the Commission. The confidentiality provisions of the statute and Commission Regulations apply to information discussed or given during conciliation.

You are reminded that Federal Law prohibits retaliation against persons who exercised their rights to inquire or complain about matters they believe may violate the law. Discrimination against persons who have cooperated in Commission investigations is also prohibited. These protections apply regardless of the Commission's determination on the merits of the charge.

On Behalf of the Commission:

DEIDRA HENRY Digitally signed by DEIDRA HENRY Date: 2022.02.14 13:50:53 -06'00'

For Linda Sales-Long Acting District Director

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 276 of 377 PageID 1101

From: Nicole Heinicke <nheinicke@santanderconsumerusa.com>

To: Kristen Lagunes klagunes@santanderconsumerusa.com, Misty Donnell

<mdonnell@santanderconsumerusa.com>, Whitney Andres

<wandres@santanderconsumerusa.com>, Jeanette Rodriguez

<JRODRIGUEZ@santanderconsumerusa.com>, Reena Mathew

<rmathew@santanderconsumerusa.com>, Sabrina Boyd

<SBOYD@santanderconsumerusa.com>, Melissa Lawson

<MLAWSON@santanderconsumerusa.com>, Hortensia Perez

<hperez@santanderconsumerusa.com>

Cc: Angelina Hullum < AHULLUM@santanderconsumerusa.com >, Yessica Adriano

<YADRIANO@santanderconsumerusa.com>, Kayla Liggett

<kliggett@santanderconsumerusa.com>

Subject: Headcount

Date: Wed, 16 Sep 2015 17:09:48 +0000

Importance: Normal

Attachments: Headcount_by_Department.xlsm

Hello!

I finally updated the headcount to reflect the recent changes in the team and business structure. Please let me know if you have any questions. It can be found in the headcount folder on the G Drive. (G:\HR Site Folders\NRH\Headcount)

Thanks! Nicole

Nicole Heinicke

Santander Consumer USA Inc. HR Generalist

PHONE 214.452.7016 MOBILE 214.212.8260

EMAIL <u>nheinicke@santanderconsumerusa.com</u>
WEB <u>www.santanderconsumerusa.com</u>

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 277 of 377 PageID 1102

				_			Location		To To	Subtotal Match	Sabrina	Misty	Reena	Melissa V	Whitnow V	rioton Ton	sya Jeanette
SVP	Cost Center	Departments	Headcount	Corpora	te Denver	Lewisville N		Remote Office Co	orporate THX	Subtotal Iviatori	102		659				85 28
Mark Mooney	047	Reinstatements	35		0 1	3	31	0	. 0	35 Yes							
		CC Reinstatements	10		0 0	10	0		0	10 Yes			C	Combined	3103		
		Recovery Operations Dealer Control	13 65		0 0	0	5	0	8 65	13 Yes 65 Yes							
		Collateral Recovery	50		0 0	13	37		0	50 Yes							
		CC Coll Recv	8		0 0	0	8		0	8 Yes							
		Non Collateral Deficiency	7		0 0	0	7		0	7 Yes							
		Vendor Oversight	45		0 0	4	41		0	45 Yes							
		CC Vdr Oversight	6		0 0	2	4	0	0	6 Yes							
			239														
Dominique Doyenard	031	Dialer Administration	9		6 0	3	0	0	0	9 Yes							
		Business Process Optimization	10		0 0	1	7		0	10 Yes							
		Operational Analytics	8		0 0	3	0	5	0	8 Yes							
			27														
Linda Vrazel	031	Quality Assurance	51		0 0	0	9	1	41	51 Yes							
Linda Viazoi	001	CC Dealer Advocacy and Maintenance	19		0 0	0	0	0	19	19 Yes							
		Credit Bureau Advocacy	18		0 0	10	0		8	18 Yes							
		Advocacy Analytics	1		0 0	0	1		0	1 Yes							
		Customer Advocacy	28		0 0	0	28	0	0	28 Yes							
			117														
Graham Anderson	036	Titles	73		0 0	0	73	0	U	73 Yes							
2.2	1	CC Titles	10		0 0	0	10		0	10 Yes							
		Insurance	45		0 0	0	45	0	0	45 Yes							
		CC Insurance	15		0 0	0	15		0	15 Yes							
	1	Account Services Unit ASU	46		0 0	0	46	0	0	46 Yes							
	050	CC Account Services Unit	5 30		0 0	0	<u>5</u> 30	0	0	5 Yes 30 Yes							
	050	Impounds CC Impounds	7		0 0	0	7		0	7 Yes							
	1	OO IIIIpourius	231		0 0	٥	,	, o		7 103							
Scott Dieckman	047	Unsecured Credit Card	61		60 0	0	1	0	0	61 Yes							
			61														
James Hart	031	Quality Control	75		1 0	0	29	0	45	75 Yes							
		Strategic Operations	19		1 0	2	2		14	19 Yes							
			94														
Tamika Carr	034	Decarem Menonement	62			0	40	0	44	63 Yes							
Tamika Can		Program Management Program Management CCAR	63		0 0	0	19 0		44	1 Yes							
	1	1 Togram Management 00711	64		0 0	٥	<u> </u>	· ·		1 103							
Kim Thorndyke	046	Customer Service	157		0 42	44	71	0	0	157 Yes							
		Customer Service Operations	5		0 0	0	5	0	0	5 Yes							
		OSP Vendor Management CC Customer Service Support	228		0 1 0 37	58	133	0	0	5 Yes 228 Yes							
		CC Customer Service Support	395		0 37	30	100	<u> </u>	0	220 163							
Brent Huisman	050	Asset Remarketing	58		0 0	0	56	2	0	58 Yes							
		CC Asset Remarketing	45		0 0	2	43		0	45 Yes							
		Auctions CC Auctions	30		0 0	0	<u>3</u>		0	30 Yes 0 Yes							
		CC Auctions	133		0 0	U	U	U	0	o res							
Brad Quick		Specialized Services	73		0 0	0	73		0	73 Yes							
	038	Cease and Desist	0		0 0	0	0	0	0	0 Yes							
	035	Bankruptcy CC Bankruptcy	86		0 1	0	85 6	0	0	86 Yes 6 Yes							
	1	100 Darini upitoy	165		0	- 0		0	- 0	0 165							
Wayne Nightengale	049	Late Stage	818		0 211	312	295	0	0	818 Yes							
	1	Early Stage	129		0 34	43	52	0	0	129 Yes							
	+	CC Late Stage CC Early Stage	158 157		0 0 58	87 69	71	0	0	158 Yes 157 Yes							
	+	Collections Operations	6		0 2	2	30	0	0	6 Yes							
	-	1	1268					•									
			2		1 0	0	1		0	2 Yes							
Scott Rundle	056	RL Orig Operations			0												
Scott Rundle		RL Orig Operations RL Sales	27		0 0	0	25	2	0	27 Yes							
Scott Rundle		RL Orig Operations RL Sales			0 0	0	25	2	0	27 Yes							
Scott Rundle Tony Kutiper		RL Orig Operations RL Sales Funding Operations	27 29 4		1 0	0	0		3	4 Yes							
		RL Sales Funding Operations Core Funding	27 29 4 56		1 0 56 0	0	0	0	3	4 Yes 56 Yes							
		RL Sales Funding Operations	27 29 4		1 0	0	0	0 0	3 0	4 Yes							

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 278 of 377 PageID 1103

		Fifth Third	4	4	0	0	0	0	0		Yes
		Funding Support	16	16	0	0	0	0	0	16 \	
		CC Funding	123	123	0	0	0	0	0	123 \	
		CC Call Center	15	15	0	0	0	0	0	15 \	
		NMAC	13	13	0	0	0	0	0	13 \	
	048	Credit	92	0	0	0	0	4	88	92 \	
		Credit Operations	4	0	0	0	0	0	4	4	Yes
			372								
			400				40		70		
lichael Hedlund	040	Accounting	120	0	0	0	42	0	78	120	Yes
			120								
im Brewster	045	IT Service Support	60	4	5	6	32	0	13	60 N	Yes
		IT Call Center Office	20	0	1	15	4	0	0	20 \	Yes
		IT Client Services	14	0	0	8	5	0	1	14 \	
		1	94								
obin Page	055	Profitability Analytics	7	0	0	0	2	0	-	7	Voc
ODIII Fage	055	Data Reporting		0	0	2	8	2	3	14	
	-	Data Reporting	14 21	0	U	2	0	2		14	100
			21								
aymond Scott	024	Legal & Regulatory Profes	21	0	0	0	1	3	17	21 \	
		Legal & Regulatory Suppor	37	0	0	0	1	1	35	37 \	Yes
		Replevin	11	0	0	0	11	0	0	11 \	Yes
		·	69								

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 279 of 377 PageID 1104

From: Nicole Heinicke <nheinicke@santanderconsumerusa.com>

To: Kristen Lagunes klagunes@santanderconsumerusa.com, Misty Donnell

<mdonnell@santanderconsumerusa.com>, Whitney Andres

<wandres@santanderconsumerusa.com>, Jeanette Rodriguez

<JRODRIGUEZ@santanderconsumerusa.com>, Reena Mathew

<rmathew@santanderconsumerusa.com>, Sabrina Boyd

<SBOYD@santanderconsumerusa.com>, Melissa Lawson

<MLAWSON@santanderconsumerusa.com>, Hortensia Perez

<hperez@santanderconsumerusa.com>

Cc: Angelina Hullum <AHULLUM@santanderconsumerusa.com>, Yessica Adriano

<YADRIANO@santanderconsumerusa.com>, Kayla Liggett

<kliggett@santanderconsumerusa.com>

Subject: Headcount

Date: Mon, 21 Sep 2015 14:04:41 +0000

Importance: Normal

Attachments: Headcount by Department.xlsm

Hello!

We have updated the Headcount report for this week. Please let me know if you have any questions. It can be found in the headcount folder on the G Drive. (G:\HR Site Folders\NRH\Headcount)

Thanks! Nicole

Nicole Heinicke

Santander Consumer USA Inc. HR Generalist

PHONE 214.452.7016 MOBILE 214.212.8260

EMAIL <u>nheinicke@santanderconsumerusa.com</u>
WEB <u>www.santanderconsumerusa.com</u>

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 280 of 377 PageID 1105

Comparison Com								1 6		Outstand Dankel	O a basina a Milata	Devis	all and AAH it and IZ	T.	
Section Sect	SVP	Cost Cente	Departments	Headcount	Corporate	Denver Lev	visville Nor	Location th Richland Hills Remote	Office Corporate TH	Subtotal Match X					28
	Mark Mooney		Reinstatements	35	0	1	3	31	0	0 35 Yes					
Goate Control			CC Reinstatements			0	9	•	0			Co	mbined 3034		
Coheren Recovery						0	0								
Sectional Editionary 7						0	13			0 49 Yes					
Very Accordance 40 30 41 0 0 42 76				8		0	0	8	-						
Color Management Color Manag		-		7		0	0	7							
Description		+	CC Vdr Oversight			0	2								
Business Protos Colorination 10		1	100 var oversignt			٠	_		0	0 103					
Business Protos Colorination 10			_												
Contention American Contention American	Dominique Doyenard	031			6		3			0 9 Yes					
Content		+	Operational Analytics	8	0	0	3								
C.C. Deser Advisorant and Materians 19			operational / marytros	27				•		0 100					
C.C. Deser Advisorant and Materians 19															
Contribution Cont	Linda Vrazel	031					0								
Absolute Andrews		+		19			10								
Colorer Anderson 17 18 18 19 19 19 19 19 19		+		19			0								
Comban Anderson Comban And				27		0	0								
C. Titles				118	-			•	•						
C. Titles	Craham Anderson	036	Titles	72		٥١	٥	72	0	0 72 V					
Incurance 44	Granam Anderson	036													
C Instance		1													
CC Account Service Light 5 0 0 0 8 0 0 5 Vec			CC Insurance	16			0		0	0 16 Yes					
Sold Deckman								46							
Colimpounds		050						5							
Control Deckman Control Cared Cared Control Cared Cont		030		7				7							
Sent Huisman		-		231	- 1	-									
Sent Huisman															
Same Hart 0.51 Quality Control 75 1 0 0 28 0 45 19 19 15 19 16 19 16 19 16 19 16 19 19	Scott Dieckman	047	Unsecured Credit Card	61	60]	0	0	1	0	0 61 Yes					
Strategic Operations				01											
Familika Cierr OS4 Program Management 653 0 0 0 0 19 0 0 1 1 1 1 1 1 1 1 1 1 1 1	James Hart	031	Quality Control	75	1	0	0	29	0	15 75 Yes					
Familia Carr 034 Program Management CCAR 1 1 0 0 0 0 19 0 1 19 0 44 19 8 19 19 19 19 19 19 19 19 19 19 19 19 19			Strategic Operations		0	0	2	2	0	15 19 Yes					
Program Management CGAR				94											
Program Management CGAR	Tamika Carr	034	Program Management	63	0	٥١	0	19	0	14 63 Yes					
Standard Service 156	Turrina Guri	- 004		1				1.5							
Customer Service Operations 5		•		64	•				'						
Customer Service Operations 5	Kina Thanashala	0.40	0	450	0	40	44	70	0	0 450 V					
OSP Vendor Management 5	Kim i nornayke	046					0	70	-						
CC Customer Service Support 227 393						1	1	1							
Step Huisman OSO Asset Remarketing Se			CC Customer Service Support			36	58	133	0						
CC Asset Remarketing				393											
CC Asset Remarketing	Pront Hujomon	050	Asset Remarkating	50	ام	٥	1	55	2	1 50 Voc					
Auctions 30 0 0 0 3 27 0 0 0 0 0 0 0 0 0	Dientriaisman	030	CC Asset Remarketing	45		0	0		0						
134 134 134 134 134 134 134 134 134 134 135			Auctions	30	0	0	0	3		0 30 Yes					
Strad Quick 038 Specialized Services 72 0 0 0 72 0 0 0 72 Ves			CC Auctions		0	0	0	0	0	0 0 Yes					
0.38 Cease and Desist 0 0 0 0 0 0 0 0 0				134											
0.38 Cease and Desist 0 0 0 0 0 0 0 0 0	Brad Quick	038	Specialized Services	72	0	0	0	72	0	0 72 Yes					
Mayne Nightengale 0.49		038	Cease and Desist	0		0	0	0		0 0 Yes					
Nayne Nightengale 049		035				1		85							
Wayne Nightengale 049 Late Stage 766 Early Stage 126 0 32 43 51 0 0 126 Yes CC Late Stage 158 0 0 87 71 0 0 158 Yes CC Early Stage 155 0 57 68 30 0 0 155 Yes Collections Operations 6 0 2 2 2 0 0 6 Yes Scott Rundle 056 RL Orig Operations 2 1 0 0 1 0 0 2 Yes Forth Wither 054 Funding Operations 4 1 0 0 0 0 0 3 4 Yes Core Funding 56 66 0 0 0 0 0 0 56 Yes			CC Bankruptcy		0	0	0	6	0	0 6 Yes					
Early Stage				104											
Early Stage	Wayne Nightengale	049		766				295							
CC Early Stage 155 0 57 68 30 0 0 0 155 Yes			Early Stage	126	0	32		51		0 126 Yes					
Collections Operations 6 0 2 2 2 0 0 6 Yes			CC Late Stage			0		71							
1211		1				2	2	30							
Scott Rundle 056 RL Orig Operations 2 1 0 0 1 0 0 2 Yes RL Sales 27 0 0 0 25 2 0 27 Yes Tony Kutiper 054 Funding Operations 4 1 0 0 0 0 3 4 Yes Core Funding 56 56 0 0 0 0 0 56 Yes			тольского Ороганого		U U					0 163					
RL Sales 27 0 0 0 0 25 2 0 27 Yes															
Core Funding Operations 4	Scott Rundle	056		2	1										
Fony Kutiper 054 Funding Operations 4 1 0 0 0 0 3 4 Yes Core Funding 56 56 0 0 0 0 0 56 Yes	<u> </u>		ILL Sales		0	U	U	25	- 2	2/ Yes					
Core Funding 56 56 0 0 0 0 0 56 Yes				20											
	Tony Kutiper	054		4	1					3 4 Yes					
Core Call Certifer 17 0 0 0 0 17 Tes		1													
			Toole Call Center	17	17	U	U	U	U	1/ Tes					

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 281 of 377 PageID 1106

			Total	3442					THX Total	408	
		Періотії		67		, o	- 0	- 11	· · ·	U	
		Legal & Regulatory Suppor Replevin		11	0			11	0	35	11
Raymond Scott	024	Legal & Regulatory Profes		19 37	0			1	3	15 35	19 37
10 "	004	h 100 11 0 1		40						15	
				21							
-		Data Reporting		14	0	0	2	8	2	2	14
obin Page	055	Profitability Analytics		7	0	0	0	2	0	5	7
				34							
	1	IT Client Services		14 94	0	0	8	5	0	1	14
	-	IT Call Center Office		20	0		15	4	0	0	20
im Brewster	045	IT Service Support		60 20	4	5		32	0	13	60
			-	123					•		
/lichael Hedlund	040	Accounting		123	0	0	0	43	0	80	123 `
		Orean operations		374		U	٥	۰	o o	-	-
	040	Credit Operations		4	0			0	0	4	4 \
	048	Credit		93	0			0	4	89	13 \ 93 \
		CC Call Center NMAC		13	15 13			0	0	0	15 `
		CC Funding		123 15	123	0		0	0	0	123
		Funding Support		18	18			0	0	0	18
		Fifth Third		4	4	0		0	0	0	4
		Chrysler Subvention		1	1	0	0	0	0	0	1 `
		Funding Direct		11	11			0	0	0	11 `
		CarMax		15	15		0	0	0	O	15

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 282 of 377 PageID 1107

From: Nicole Heinicke <nheinicke@santanderconsumerusa.com>

To: Kristen Lagunes klagunes@santanderconsumerusa.com, Misty Donnell

<mdonnell@santanderconsumerusa.com>, Whitney Andres

<wandres@santanderconsumerusa.com>, Jeanette Rodriguez

<JRODRIGUEZ@santanderconsumerusa.com>, Reena Mathew

<rmathew@santanderconsumerusa.com>, Sabrina Boyd

<SBOYD@santanderconsumerusa.com>, Melissa Lawson

<MLAWSON@santanderconsumerusa.com>, Hortensia Perez

<hperez@santanderconsumerusa.com>

Cc: Angelina Hullum < AHULLUM@santanderconsumerusa.com >, Yessica Adriano

<YADRIANO@santanderconsumerusa.com>, Kayla Liggett

<kliggett@santanderconsumerusa.com>

Subject: Headcount

Date: Mon, 28 Sep 2015 14:13:53 +0000

Importance: Normal

Attachments: Headcount_by_Department.xlsm

Hello!

We have updated the Headcount report for this week. Please let me know if you have any questions. It can be found in the headcount folder on the G Drive. (G:\HR Site Folders\NRH\Headcount)

Thanks! Nicole

Nicole Heinicke

Santander Consumer USA Inc. HR Generalist

PHONE 214.452.7016 MOBILE 214.212.8260

EMAIL <u>nheinicke@santanderconsumerusa.com</u>
WEB <u>www.santanderconsumerusa.com</u>

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 283 of 377 PageID 1108

							Location		Cubinta	I Matab	Sabrina	Minh	Reena	Meliana	Mhitmard	/vioton T	maya laa	nette
SVP	Cost Center	Departments	Headcount	Corporate	Denver	Lewisville I		Remote Office Cor		Match	100	Misty 648	650	Melissa 349	653	210	ensya Jea 384	28
Mark Mooney	047	Reinstatements	36	0	1	3	32	0	0 3	36 Yes								
		CC Reinstatements	9	0		9	0			9 Yes				Combined	3022			
		Recovery Operations Dealer Control	14 67	0		0	<u>5</u>	0		14 Yes 67 Yes								
		Collateral Recovery	49	0		13	36	0		19 Yes								
		CC Coll Recv	8	0		0	8	0		8 Yes								
		Non Collateral Deficiency Vendor Oversight	7 45	0		0				7 Yes 15 Yes								
		CC Vdr Oversight	6	0		2	41			6 Yes								
	1	oo var overeigin	241		ŭ			•	Ů	0 100								
Dominique Devenerd	031	Dialer Administration	10	6	0	4	0	0	0 1	10 Yes								
Dominique Doyenard	031	Business Process Optimization	10	0	U	1	<u></u>			10 Yes								
		Operational Analytics	8	0	0	3	0	5	0	8 Yes								
			28															
Linda Vrazel	031	Quality Assurance	51	0	0	0	9	1	41 5	51 Yes								
Ellida Videoi		CC Dealer Advocacy and Maintenance	19	0		0	0			19 Yes								
		Credit Bureau Advocacy	19	0		10	0	0		19 Yes								
		Advocacy Analytics	20	0		0	1 20	0		1 Yes								
		Customer Advocacy	110	0	U	U	20	0		20 Yes								
Graham Anderson	036	Titles	71	0		0	71			71 Yes								
		CC Titles Insurance	10 43	0		0	10 43			10 Yes 13 Yes								
		CC Insurance	17	0		0	17	0		17 Yes								
		Account Services Unit ASU	45	0		0	45	0	0 4	15 Yes								
	050	CC Account Services Unit	5	0		0	<u>5</u> 33	0	0 3	5 Yes 33 Yes								
	050	Impounds CC Impounds	33	0		0				7 Yes								
	1	oo impoundo	231		, °I		•	•										
0 "B: I	0.47		50	-	ام													
Scott Dieckman	047	Unsecured Credit Card	59 59	58	0	0	1	0	0 5	59 Yes								
			00															
James Hart	031	Quality Control	78	1		0	31			78 Yes								
		Strategic Operations	19	0	0	2	2	0	15 1	19 Yes								
			97															
Tamika Carr	034	Program Management	63	0	0	0	19	0	44 6	33 Yes								
		Program Management CCAR	1	0	0	0	0	0	1	1 Yes								
			64															
Kim Thorndyke	046	Customer Service	154	0	42	43	69	0	0 15	54 Yes								
-		Customer Service Operations	5	0		0	5	0		5 Yes								
		OSP Vendor Management	5	0		1	100	2		5 Yes								
		CC Customer Service Support	225 389	0	36	57	132	U	- 0 22	25 Yes								
Brent Huisman	050	Asset Remarketing	57	0		1	54			7 Yes								
		CC Asset Remarketing Auctions	45 31	0		0	37 3			15 Yes 31 Yes								
		CC Auctions	0	0		0	0			0 Yes								
	•		133					'										
Brad Quick	038	Specialized Services	73	0		0	73	0	0 7	73 Yes								
Didd Quick	038	Cease and Desist	0	0		0	0	0		0 Yes								
	035	Bankruptcy	83	0	1	0	82		0 8	33 Yes								
		CC Bankruptcy	6	0	0	0	6	0	0	6 Yes								
			162															
Wayne Nightengale	049	Late Stage	775	0		310	291	0		75 Yes								
		Early Stage	122	0		42	50	0		22 Yes								
<u></u>	-	CC Late Stage CC Early Stage	159 151	0		87 66	72	0		59 Yes 51 Yes								
		Collections Operations	6	0		2	29	0		6 Yes								
			1213						-									
Coatt Dundle	OFC	DI Oria Operations	2	1	0	C	4	0	0	2 Yes								
Scott Rundle	056	RL Orig Operations RL Sales	27	0		0	1 25			2 Yes 27 Yes								
	1	1	29		3			-										
Tony Kutiper	054	Funding Operations Core Funding	14 56	11 56		0	0			14 Yes 56 Yes								
		Core Funding Core Call Center	17	17	0	0	0			17 Yes								
L						-		-		_								

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 284 of 377 PageID 1109

			Total	3433					THX Total	411	
	-	Itopiciii		67		0	U	111	U	0	
	+	Replevin		11	0	0		11	0	0	11 Y
iyinonu Scott	024	Legal & Regulatory Profes Legal & Regulatory Suppor		37	0	0		1	3	15 35	37 Y
aymond Scott	024	Legal & Regulatory Profes		19	0	0	0	41	3	15	19 Y
		·	-	21					•		
		Data Reporting		14 21	0	0	2	8	2	2	14 Y
bin Page	055	Profitability Analytics		7	0	0	0	2	0	5	7 Y
				54							
	1	IT Client Services		94	U	U	O	J	U		14 1
	1	IT Client Services		20 14	0	0		5	0	1	14 Y
III Diewstei	043	IT Call Center Office		30	0		15	32	0	13	20 Y
m Brewster	045	IT Service Support		60	4	5	6	32	0	13	60 Y
				123							
ichael Hedlund	040	Accounting		123	0	0	0	43	0	80	123 Y
	'		· ·	372				•	<u> </u>		
	-	Credit Operations		4	0		0	0	0	4	4 Y
	048	Credit		93	0			0	4	89	93 Y
	+	NMAC		13	13			0	0	0	13 Y
		CC Funding CC Call Center		15	15			0	0	0	111 Y
		Funding Support		18 111	18 111	0		0	0	0	18 Y
		Fifth Third		4	4	0		0	0	0	4 Y
		Chrysler Subvention		1	1	0		0	0	0	1 Y
		Funding Direct		11	11	0		0	0	0	11 Y
		CarMax		15	15			0		0	15 Y

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 285 of 377 PageID 1110

From: Nicole Heinicke <nheinicke@santanderconsumerusa.com>

To: Kristen Lagunes klagunes@santanderconsumerusa.com, Misty Donnell

<mdonnell@santanderconsumerusa.com>, Whitney Andres

<wandres@santanderconsumerusa.com>, Jeanette Rodriguez

<JRODRIGUEZ@santanderconsumerusa.com>, Reena Mathew

<rmathew@santanderconsumerusa.com>, Sabrina Boyd

<SBOYD@santanderconsumerusa.com>, Melissa Lawson

<MLAWSON@santanderconsumerusa.com>, Hortensia Perez

<hperez@santanderconsumerusa.com>

Cc: Angelina Hullum <AHULLUM@santanderconsumerusa.com>, Yessica Adriano

<YADRIANO@santanderconsumerusa.com>, Kayla Liggett

<kliggett@santanderconsumerusa.com>

Subject: Headcount

Date: Mon, 05 Oct 2015 13:25:05 +0000

Importance: Normal

Attachments: Headcount_by_Department.xlsm

Hello!

We have updated the Headcount report for this week. Please let me know if you have any questions. It can be found in the headcount folder on the G Drive. (G:\HR Site Folders\NRH\Headcount)

Thanks! Nicole

Nicole Heinicke

Santander Consumer USA Inc. HR Generalist

PHONE 214.452.7016 MOBILE 214.212.8260

EMAIL <u>nheinicke@santanderconsumerusa.com</u>
WEB <u>www.santanderconsumerusa.com</u>

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 286 of 377 PageID 1111

							1 6		louis de la company	Ochol	Minter.	P	14/1-2	Coloton T	
SVP	Cost Center	Departments	Headcount	Corporate	e Denver Le	ewisville N	Location Iorth Richland Hills	Remote Office Corporate	Subtotal Match			Melissa 42 376		Kristen Ter 208 3	Sya Jeanett 34 28
Mark Mooney		Reinstatements	40		0 4	3	33	0	0 40 Yes	1					
		CC Reinstatements	9		0 0	9	0	0	0 9 Yes			Combined	3087		
		Recovery Operations	13		0 0	0	5		8 13 Yes						
		Dealer Control Collateral Recovery	66 49		0 0	14	0 35	0	66 66 Yes 0 49 Yes						
		CC Coll Recv	9		0 0	0	9	0	0 9 Yes						
		Non Collateral Deficiency	11		0 4	0	7	0	0 11 Yes						
		Vendor Oversight	48		0 0	4	44	0	0 48 Yes						
		CC Vdr Oversight	6 251		0 0	2	4	0	0 6 Yes						
Dominique Doyenard	031	Dialer Administration	10		6 0	4	0	0	0 10 Yes						
Dominique Doyenaru	031	Business Process Optimization	9		0 0	1	6	2	0 9 Yes						
		Operational Analytics	9		0 0	4	0		0 9 Yes						
			28												
Linda Vrazel	031	Quality Assurance	54		1 0	0	9		43 54 Yes						
		CC Dealer Advocacy and Maintenance	19		0 0	0	0		19 19 Yes						
		Credit Bureau Advocacy	19		0 0	10	0	0	9 19 Yes 0 1 Yes						
		Advocacy Analytics Customer Advocacy	20		0 0	0	20		0 1 Yes 0 20 Yes						
		Customer Advocacy	113	,	0 0	U U	20	O O	0 20 163						
Graham Anderson	036	Titles	78		0 6	0	72	0	0 78 Yes						
		CC Titles	10		0 0	0	10		0 10 Yes						
		Insurance	43		0 0	0	43	0	0 43 Yes						
		CC Insurance	17		0 0	0	17	0	0 17 Yes						
		Account Services Unit ASU	46		0 0	0	46	0	0 46 Yes 0 5 Yes						
	050	CC Account Services Unit	33		0 0	0	33	0	0 5 Yes 0 33 Yes						
	000	CC Impounds	7		0 0	0	7	0	0 7 Yes						
	'		239					•							
Scott Dieckman	047	Unsecured Credit Card	56	5.	5 0	0	1	0	0 56 Yes						
			56 56			-		-							
James Hart	031	Quality Control	78		1 0	٥	30	0	47 78 Yes						
James Hait		Strategic Operations	19		0 0	2	2		15 19 Yes						
	!	onatogio o porazione	97		•			3	10 100						
Tamilia Cam	034	Drawen Management	64		ol ol	0	19	0	45 64 Yes						
Tamika Carr		Program Management Program Management CCAR	64		0 0	0	0		1 1 Yes						
		Trogram management 007 tt	65		<u>σ</u>	0	· ·	3							
Kim Thorndyke	046	Customer Service	147		0 35	43	69	0	0 147 Yes						
Tim Thomayno	0.10	Customer Service Operations	5		0 0	0	5	0	0 5 Yes						
		OSP Vendor Management	5		0 1	1	1	2	0 5 Yes						
		CC Customer Service Support	223		0 35	57	131	0	0 223 Yes						
			380												
Brent Huisman	050	Asset Remarketing	56		0 0	1	53	1	1 56 Yes						
		CC Asset Remarketing	46		0 0	0	37	0	9 46 Yes						
		Auctions	31		0 0	0	3		0 31 Yes						
		CC Auctions	133		0 0	0	0	0	0 0 Yes						
Brad Quick	038 038	Specialized Services	72		0 0	0	72	0	0 72 Yes 0 0 Yes						
		Cease and Desist Bankruptcy	0 89		0 0 7	0	0 82		0 0 Yes 0 89 Yes						
	033	CC Bankruptcy	6		0 0	0	6	0	0 6 Yes						
		1 2	167												
Wayne Nightengale	049	Late Stage	801		0 171	307	_323	0	0 801 Yes						
		Early Stage	147	1	0 42	40	65	0	0 147 Yes						
		CC Late Stage	160		0 1	87	72	0	0 160 Yes						
		CC Early Stage	159		0 68	64	27	0	0 159 Yes						
<u> </u>	1	Collections Operations	1273		0 2	2	2	0	0 6 Yes						
Coott Dundle	OFC	DI Orig Operations	2		1 0	0	1	0	0 2 2						
Scott Rundle		RL Orig Operations RL Sales	27		0 0	0	25		0 2 Yes 0 27 Yes						
		inc sales	29		VI		20		2/ 165						
			15		0,1										
Tony Kutiper	054	Funding Operations Core Funding	15 56	1: 5		0	0	0	3 15 Yes 0 56 Yes						
		Core Call Center	18	1		0	0	0	0 18 Yes						
I	-	1 5411 551161				- J	0		10 .00	_					

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 287 of 377 PageID 1112

			Total 3508					THX Total	414
			00						
		nepieviii	66	U	0	U	11	0	0
	-	Legal & Regulatory Suppor Replevin	36 11	0	0	0	11	0	34
taymond Scott	024	Legal & Regulatory Profes	19	0	0	0	1	3	15
	1	1	21	0		_		_	_
oo ago	- 000	Data Reporting	14	0	0	2	8	2	2
obin Page	055	Profitability Analytics	7	0	0	0	2	0	5
			94						
		IT Client Services	14	0	0	8	5	0	1
		IT Call Center Office	20	0	1	15	4	0	0
im Brewster	045	IT Service Support	60 20	4	5	6	32	0	13
		<u> </u>	124						
lichael Hedlund	040	Accounting	124	0	0	0	43	0	81
			512						
		Credit Operations	372	0	U	0	0	0	4
	048	Credit Constitute	93	0	0	0	0	0	89
		NMAC	12	12	0	0	0	0	0
		CC Call Center		15	0	0	0	0	0
		CC Funding	110 15	110	0	0	0	0	0
		Funding Support	18	18	0	0	0	0	0
		Fifth Third	4	4	0	0	0	0	0
		Chrysler Subvention	1	1	0	0	0	0	0
		CarMax Funding Direct	15 11	15 11	0	0	0	0	0

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 288 of 377 PageID 1113

From: Nicole Heinicke <nheinicke@santanderconsumerusa.com>

To: Kristen Lagunes klagunes@santanderconsumerusa.com, Misty Donnell

<mdonnell@santanderconsumerusa.com>, Whitney Andres

<wandres@santanderconsumerusa.com>, Jeanette Rodriguez

<JRODRIGUEZ@santanderconsumerusa.com>, Reena Mathew

<rmathew@santanderconsumerusa.com>, Sabrina Boyd

<SBOYD@santanderconsumerusa.com>, Melissa Lawson

<MLAWSON@santanderconsumerusa.com>, Hortensia Perez

<hperez@santanderconsumerusa.com>

Cc: Angelina Hullum < AHULLUM@santanderconsumerusa.com >, Yessica Adriano

<YADRIANO@santanderconsumerusa.com>, Kayla Liggett

<kliggett@santanderconsumerusa.com>

Subject: Headcount

Date: Mon, 12 Oct 2015 13:54:30 +0000

Importance: Normal

Attachments: Headcount by Department.xlsm

Hello!

We have updated the Headcount report for this week. Please let me know if you have any questions. It can be found in the headcount folder on the G Drive. (G:\HR Site Folders\NRH\Headcount)

Thanks! Nicole

Nicole Heinicke

Santander Consumer USA Inc. HR Generalist

PHONE 214.452.7016 MOBILE 214.212.8260

EMAIL <u>nheinicke@santanderconsumerusa.com</u>
WEB <u>www.santanderconsumerusa.com</u>

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 289 of 377 PageID 1114

							Landin		0.14.4.1 1	O a basin a	. D.	Mallana	ita de la constanta de la cons		
SVP	Cost Center	Departments	Headcount	Corporate	e Denver L	ewisville N	Location Iorth Richland Hills F	temote Office Corporate	Subtotal Match	Sabrina Misty 100 650		Melissa Wh	01 20	en Tensya 2 384	Jeanette 28
Mark Mooney		Reinstatements	40	22, 40100	0 4	3	33	0	0 40 Yes	22 000		•		1 22.	
		CC Reinstatements	9		0 0	9	0	0	0 9 Yes			Combined 30	71		
		Recovery Operations	13		0 0	0	5	0	8 13 Yes						
		Dealer Control Collateral Recovery	66 49		0 0	14	0 35	0	66 66 Yes 0 49 Yes						
		CC Coll Recv	9		0 0	0	9	0	0 9 Yes						
		Non Collateral Deficiency	11		0 4	0	7	0	0 11 Yes						
		Vendor Oversight	48		0 0	4	44	0	0 48 Yes						
		CC Vdr Oversight	250		0 0	2	3	0	0 5 Yes						
Dominique Doyenard	031	Dialer Administration	10		6 0	4	0	0	0 10 Yes						
Dominique Doyenaru	031	Business Process Optimization	9		0 0	1	7	1	0 9 Yes						
		Operational Analytics	9		0 0	4	0	5	0 9 Yes						
			28												
Linda Vrazel	031	Quality Assurance	54		1 0	0	7	1	45 54 Yes						
		CC Dealer Advocacy and Maintenance	19		0 0	0	0	0	19 19 Yes						
		Credit Bureau Advocacy	18		0 0	10	0	0	8 18 Yes 0 1 Yes						
		Advocacy Analytics Customer Advocacy	18		0 0	0	18	0	0 18 Yes						
	ļ	oustomer //dvocacy	110		0 0	- U	10	<u> </u>	0 10 103						
Graham Anderson	036	Titles	78		0 6	0	72	0	0 78 Yes						
		CC Titles	10		0 0	0	10	0	0 10 Yes						
		Insurance	44		0 0	0	44	0	0 44 Yes						
		CC Insurance	17		0 0	0	17	0	0 17 Yes						
		Account Services Unit ASU CC Account Services Unit	44		0 0	0	44	0	0 44 Yes 0 5 Yes						
		Impounds	33		0 0	0	33	0	0 33 Yes						
	000	CC Impounds	7		0 0	0	7	0	0 7 Yes						
			238					·							
Scott Dieckman	047	Unsecured Credit Card	55	5	4 0	0	1	0	0 55 Yes						
	•		55 55					•							
James Hart	031	Quality Control	80		1 0	0	31	0	48 80 Yes						
ouries riure		Strategic Operations	19		0 0	2	2	0	15 19 Yes						
			99				<u></u>								
Tamika Carr	034	Program Management	61		0 0	0	16	0	45 61 Yes						
Tallika Call		Program Management CCAR	1		0 0	0	0	0	1 1 Yes						
	ļ		62				-								
Kim Thorndyke	046	Customer Service	147		0 35	43	69	0	0 147 Yes						
,		Customer Service Operations	5		0 0	0	5	0	0 5 Yes						
		OSP Vendor Management	5		0 1	1	1	2	0 5 Yes						
		CC Customer Service Support	223		0 35	57	131	0	0 223 Yes						
			380												
Brent Huisman	050	Asset Remarketing	58		0 0	1	53	3	1 58 Yes						
		CC Asset Remarketing	46		0 0	0	37	0	9 46 Yes						
		Auctions CC Auctions	29		0 0	0	3	26 0	0 29 Yes 0 0 Yes						
		CC Auctions	133		0 0	U	U _I	U	0 Tes						
Brad Quick	038	Specialized Services	71		0 0	0	71	0	0 71 Yes						
Diau Quick	038	Cease and Desist	0		0 0	0	0	0	0 0 Yes						
		Bankruptcy	90		0 7	0	83	0	0 90 Yes						
		CC Bankruptcy	6		0 0	0	6	0	0 6 Yes						
			167												
Wayne Nightengale		Late Stage	820		0 180	313	327	0	0 820 Yes						
<u> </u>		Early Stage	127		0 29	32	66	0	0 127 Yes						
		CC Late Stage CC Early Stage	172 141		0 11 0 55	89 60	72	0	0 172 Yes 0 141 Yes						
		Collections Operations	6		0 33	2	20	0	0 6 Yes						
	•	· · · · · · · · · · · · · · · · · · ·	1266												
Scott Rundle	056	RL Orig Operations	2		1 0	0	1	0	0 2 Yes						
		RL Sales	27		0 0	0	25	2	0 27 Yes						
									1						
	·		29												
Tony Kutiper		Funding Operations	15		2 0	0	0	0	3 15 Yes						
Tony Kutiper		Funding Operations Core Funding Core Call Center		5	2 0 66 0 8 0	0	0	0	3 15 Yes 0 56 Yes 0 18 Yes						

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 290 of 377 PageID 1115

			Total	3496				_	HX Total	418	
				-0							
		repleviii		68	U	ا ا	U	11	0	U	
	-	Legal & Regulatory Suppor Replevin		36 11	0		0	11	0	34	36 \ 11 \
aymond Scott	024	Legal & Regulatory Profes		21	0		0	1	3	17	21 `
									_		
	-	- i - j - j	-	22					_		
	1	Data Reporting		15	0		2	8	2	3	15 `
obin Page	055	Profitability Analytics		7	0	0	0	2	0	5	7 `
				94							
		IT Client Services		14	0	0	8	5	0	1	14
		IT Call Center Office		20	0		15	4	0	0	20 `
lim Brewster	045	IT Service Support		60	4		6	32	0	13	60
		<u>.</u>									
		<u> </u>		123							
lichael Hedlund	040	Accounting		123	0	l 0l	0	43	0	80	123 `
				012							
		Credit Operations		372	U	U	U	U	U	4	4
	048	Credit Credit Operations		93	0		0	0	0	89	93 \
	0.10	NMAC		12	12		0	0	0	0	12 `
		CC Call Center			15		0	0	0	0	15 `
		CC Funding		110 15	110		0	0	0	0	110 `
		Funding Support		18	18	0	0	0	0	0	18 `
		Fifth Third		4	4	0	0	0	0	0	4 \
		Chrysler Subvention		1	1	0	0	0	0	0	1 \
		CarMax Funding Direct		15 11	15 11	0	0	0	0	0	15 ` 11 `

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 291 of 377 PageID 1116

From: Nicole Heinicke <nheinicke@santanderconsumerusa.com>

To: Kristen Lagunes klagunes@santanderconsumerusa.com, Misty Donnell

<mdonnell@santanderconsumerusa.com>, Whitney Andres

<wandres@santanderconsumerusa.com>, Jeanette Rodriguez

<JRODRIGUEZ@santanderconsumerusa.com>, Reena Mathew

<rmathew@santanderconsumerusa.com>, Sabrina Boyd

<SBOYD@santanderconsumerusa.com>, Melissa Lawson

<MLAWSON@santanderconsumerusa.com>, Hortensia Perez

<hperez@santanderconsumerusa.com>

Cc: Angelina Hullum <AHULLUM@santanderconsumerusa.com>, Yessica Adriano

<YADRIANO@santanderconsumerusa.com>, Kayla Liggett

<kliggett@santanderconsumerusa.com>

Subject: Headcount

Date: Tue, 20 Oct 2015 20:33:15 +0000

Importance: Normal

Attachments: Headcount_by_Department.xlsm

Hello!

We have updated the Headcount report for this week. Please let me know if you have any questions. It can be found in the headcount folder on the G Drive. (G:\HR Site Folders\NRH\Headcount)

P.S. Sorry this is later than usual – it took me a bit to get everything updated with Arapahoe I & II.

Thanks! Nicole

Nicole Heinicke

Santander Consumer USA Inc.

HR Generalist

PHONE 214.452.7016 MOBILE 214.212.8260

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 292 of 377 PageID 1117

											Cubtatal Matah	Cabrina Mia	tu Deen	Maliana M	(laite and 1/	wister T	
SVP	Cost Center	Departments	Headcount	Corporate	Arapahoe I	Arapahoe II		ocation North Richland Hills	Remote Office		Subtotal Match		Reena 0 633				ensya Jeane 385 28
Mark Mooney	047	Reinstatements	39	0	4	0	3	32	0	0	39 Yes	•	•				
		CC Reinstatements	10	0	0	0	10	0	0	_	10 Yes 12 Yes			Combined	3064		
		Recovery Operations Dealer Control	12 67	0	0		0 0	4	0		67 Yes						
		Collateral Recovery	49	0	0	0	14	35	0		49 Yes						
		CC Coll Recv	9	0	0	C	0	9	0		9 Yes						
		Non Collateral Deficiency	12	0	4	0	0	8	0		12 Yes						
		Vendor Oversight CC Vdr Oversight	50	0	0	0	4	44	0		50 Yes 6 Yes						
		CC vui Oversigni	254	o o	۰		4 - 4	-	0		o les						
Dominique Doyenard	031	Dialer Administration	10	6	٥١	0	1	0	0		10 Yes						
Dominique Doyenaru	031	Business Process Optimization	9	0	0	0		7		0	9 Yes						
		Operational Analytics	9	0	0	0	4	0	5	0	9 Yes						
			28														
Linda Vrazel	031	Quality Assurance	53	1	0	0		1		50	53 Yes						
		CC Dealer Advocacy and Maintenance	18 18	0	0	0	0 10	0			18 Yes						
		Credit Bureau Advocacy Advocacy Analytics	18	0	0	0		0		Ů	18 Yes 1 Yes						
		Customer Advocacy	16	0	0	0				-	16 Yes						
			106														
Graham Anderson	036	Titles	78	0	0	7	0		0		78 Yes						
		CC Titles	10	0	0	0	0		0		10 Yes						
		Insurance CC Insurance	47 17	0	0	0	0 0				47 Yes 17 Yes						
		Account Services Unit ASU	44	0	0	0	0				44 Yes						
		CC Account Services Unit	6	0	0	0	0	6	0	0	6 Yes						
	050	Impounds	31	0	0	0	0		0		31 Yes						
		CC Impounds	241	U	υĮ	U	0	8	0	0	8 Yes						
0 " " "	0.47	lu como de									1						
Scott Dieckman	047	Unsecured Credit Card	55 55	54	0	0	0	1	0	0	55 Yes						
	201	la iii a i i									22 1/						
James Hart	031	Quality Control Strategic Operations	80 19	1	0	0	_	31	0		80 Yes 19 Yes						
	1	oratogic operations	99	- U	•		4	_			10 100						
T	004		0.1								24.14						
Tamika Carr	034	Program Management Program Management CCAR	61	0	0	0		16 0			61 Yes 1 Yes						
		Trogram Wanagement 00711	62	- 0	<u> </u>		, 0	U	Ū		1 103						
Kim Thorndyke	046	Customer Service	147	0	25	0) 43	60	0	٥	147 Yes						
Killi Tiloillayke	040	Customer Service Operations	5	0	35	0	0 0	5	0	0	5 Yes						
		OSP Vendor Management	5	0	1	0	1	1	2	0	5 Yes						
		CC Customer Service Support	221	0	35	0	56	130	0	0	221 Yes						
			378														
Brent Huisman	050	Asset Remarketing	61	0	0	0	1	54	5	1	61 Yes						
		CC Asset Remarketing	49	0	3	0	0	36		10	49 Yes						
		Auctions CC Auctions	28	0	0	0	0 0	2	26	0	28 Yes 0 Yes						
		CC Auctions	138	U	υĮ	U	u u	0	0	0	o res						
Brad Quick	020	Specialized Services	69	0	ام	0	0	69	0		69 Yes						
Brad Quick	038	Specialized Services Cease and Desist	0	0	0	0	0		0		0 Yes						
	035	Bankruptcy	90	0	8	0	0	82	0	0	90 Yes						
		CC Bankruptcy	165	0	0	0	0	6	0	0	6 Yes						
			105														
Wayne Nightengale	049	Late Stage	817	0	179	0	312	326	0		817 Yes						
		Early Stage	109	0	29	0	30		0		109 Yes						
		CC Late Stage CC Early Stage	170 154	0	11 55	0	88		0		170 Yes 154 Yes						
		Collections Operations	6	0	2	0	2	40	0		6 Yes						
			1256														
Scott Rundle	056	RL Orig Operations	2	1	0	0) 0	1	0	nl	2 Yes						
		RL Sales	27	0	0		0		9		27 Yes						
			29														
Tony Kutiper	054	Funding Operations	4	1	ol	0	0 0	0	0	3	4 Yes						
.,		Core Funding	56	56	0	0	0	0	0	0	56 Yes						
		Core Call Center	18	18	0	0					18 Yes						
	1	CarMax	15	15	0	0	0	0	0	0	15 Yes						

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 293 of 377 PageID 1118

				68				,		_	
		Replevin		11	0	0	0	0	11	0	0
•		Legal & Regulatory Suppor		36	0	0	0	0	1	1	34
aymond Scott	024	Legal & Regulatory Profes		21	0	0	0	0	1	3	17
				22							
		Data Reporting		15	0	0	0	2	8	2	3
obin Page	055	Profitability Analytics		7	0	0	0	0	2	0	5
			•	94						-	
		IT Client Services		14	0	0	0	8	5	0	1
		IT Call Center Office		20	0	1	0	15	4	0	0
m Brewster	045	IT Service Support		60	4	5	0	6	32	0	13
				122						•	
lichael Hedlund	040	Accounting		122	0	0	0	0	43	0	79
				372							
		Credit Operations		4	0	0	0	0	0	0	4
	048	Credit		93	0	0	0	0	0	4	89
		NMAC		12	12	0	0	0	0	0	0
		CC Call Center		15	15	0	0	0	0	0	0
		CC Funding	_	121	121	0	0	0	0	0	0
		Funding Support		18	18	0	0	0	0	0	0
	-	Chrysler Subvention Fifth Third		1	1	0	0	0	0	0	0
		Funding Direct		11	11	0	0	0	0	0	0

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 294 of 377 PageID 1119

From: Nicole Heinicke <nheinicke@santanderconsumerusa.com>

To: Kristen Lagunes klagunes@santanderconsumerusa.com, Misty Donnell

<mdonnell@santanderconsumerusa.com>, Whitney Andres

<wandres@santanderconsumerusa.com>, Jeanette Rodriguez

<JRODRIGUEZ@santanderconsumerusa.com>, Reena Mathew

<rmathew@santanderconsumerusa.com>, Sabrina Boyd

<SBOYD@santanderconsumerusa.com>, Melissa Lawson

<MLAWSON@santanderconsumerusa.com>, Hortensia Perez

<hperez@santanderconsumerusa.com>

Cc: Angelina Hullum <AHULLUM@santanderconsumerusa.com>, Yessica Adriano

<YADRIANO@santanderconsumerusa.com>, Kayla Liggett

<kliggett@santanderconsumerusa.com>

Subject: Headcount

Date: Mon, 26 Oct 2015 16:21:04 +0000

Importance: Normal

Attachments: Headcount_by_Department.xlsm

Hello!

We have updated the Headcount report for this week. Please let me know if you have any questions. It can be found in the headcount folder on the G Drive. (G:\HR Site Folders\NRH\Headcount)

Thanks! Nicole

Nicole Heinicke

Santander Consumer USA Inc. HR Generalist

PHONE 214.452.7016 MOBILE 214.212.8260

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 295 of 377 PageID 1120

SVP	Cost Center	Departments	Headcount	Corporate A	rapahoe I Ar	apahoe II Le	Locatio ewisville Nort	n h Richland Hills Reme	ote Office Corporate TH	Subtotal Match	Sabrina Misty Reer 98 651 646		191 38	nsya Jeanette 85 28
Mark Mooney		Reinstatements	39	0	4	0	3	32	0	0 39 Yes	00 001 010	002 000	101 00	00 20
		CC Reinstatements	10	0	0	0	10	0	-	0 10 Yes		Combined 3087		
		Recovery Operations	12	0	0	0	0	4		8 12 Yes				
		Dealer Control	67	0	0	0	14	0	0 6					
		Collateral Recovery CC Coll Recv	49	0	0	0	14	35	0	0 49 Yes 0 9 Yes				
		Non Collateral Deficiency	12	0	4	0	0	8	0	0 12 Yes				
		Vendor Oversight	50	0	0	0	4	44		2 50 Yes				
		CC Vdr Oversight	6	0	0	0	2	4	0	0 6 Yes				
			254											
Dominique Doyenard	031	Dialer Administration	10	6	0	0	4	0	0	0 10 Yes				
		Business Process Optimization	9	0	0	0	1	7	1	0 9 Yes				
		Operational Analytics	10 29	0	0	0	5	0	5	0 10 Yes				
			20											
Linda Vrazel	031	Quality Assurance	53	1	0	0	0	0	1 5					
		CC Dealer Advocacy and Maintenance	18	0	0	0	0	0		8 18 Yes				
		Credit Bureau Advocacy Advocacy Analytics	18	0	0	0	10	0		8 18 Yes 0 1 Yes				
		Customer Advocacy	16	0	0	0	0	16	0	0 16 Yes				
	·		106											
0	000	170				0		70		0 70 V				
Graham Anderson	036	Titles CC Titles	78 10	0	0	8	0	70	0	0 78 Yes 0 10 Yes				
		Insurance	47	0	0	0	0	47		0 47 Yes				
		CC Insurance	17	0	0	0	0	17	0	0 17 Yes				
		Account Services Unit ASU	45	0	0	0	0	45	0	0 45 Yes				
		CC Account Services Unit	6	0	0	0	0	6		0 6 Yes				
	050	Impounds	32	0	0	0	0	32	0	0 32 Yes				
	1	CC Impounds	243	U	U	U	U	0	U	0 8 Yes				
Scott Dieckman	047	Unsecured Credit Card	55	54	0	0	0	1	0	0 55 Yes				
			55											
James Hart	031	Quality Control	80	1	0	0	0	31	0 4	8 80 Yes				
		Strategic Operations	19	0	0	0	2	2	0 1	5 19 Yes				
			99											
Tamika Carr	034	Program Management	61	0	0	0	0	16	0 4	5 61 Yes				
Tamika Gari	004	Program Management CCAR	1	0	0	0	0	0	0	1 1 Yes				
	•		62					•	•					
King Thomas I do	0.40	01	450		47	0	40	20		0 450 V				
Kim Thorndyke	046	Customer Service Customer Service Operations	158 5	0	47 0	0	42	5		0 158 Yes 0 5 Yes				
		OSP Vendor Management	5	0	1	0	1	1	2	0 5 Yes				
		CC Customer Service Support	221	0	35	0	56	130	0	0 221 Yes				
			389						•					
Deemt I Ivianaan	050	Assat Demonstration	62	0	4	0	4	55	5	1 63 Yes				
Brent Huisman	050	Asset Remarketing CC Asset Remarketing	63 49	0	3	0	0	55 36	0 1	0 49 Yes				
		Auctions	28	0	0	0	0	2		0 49 fes 0 28 Yes				
		CC Auctions	0	0	0	0	0	0	0	0 Yes				
			140											
Brad Quick	038	Specialized Services	68	0	0	0	0	68	0	0 68 Yes				
Diad Quiok	038	Cease and Desist	00	0	0	0	0	0		0 0 Yes				
	035	Bankruptcy	90	0	8	0	0	82	0	0 90 Yes				
		CC Bankruptcy	6	0	0	0	0	6	0	0 6 Yes				
			164							_				
Wayne Nightengale	049	Late Stage	817	0	179	. 0	312	326	0	0 817 Yes				
a, no raiginongale	040	Early Stage	109	0	29	0	30	50		0 109 Yes				
		CC Late Stage	169	0	11	0	87	71		0 169 Yes				
		CC Early Stage	166	0	54	0	72	40	0	0 166 Yes				
		Collections Operations	1267	0	2	0	2	2	0	0 6 Yes				
			1267							-				
Scott Rundle	056	RL Orig Operations	2	1	0	0	0	1	0	0 2 Yes				
Scott Rundle	056	RL Orig Operations RL Sales	2 27	1 0	0	0	0	1 25	2	0 2 Yes 0 27 Yes				
Scott Rundle	056		2 27 29	1 0										
		RL Sales	2 27 29	1 0			0	25	2	0 27 Yes				
Scott Rundle Tony Kutiper	056	RL Sales Funding Operations	29	1 1 56	0	0								
		RL Sales	2 27 29 4 56 19	1 0 1 56 19	0	0	0	25	0	0 27 Yes 3 4 Yes				

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 296 of 377 PageID 1121

		Tota	al 3514		Grave	Total	0	-	HX Total	427	
			07								
		Replevin	67	U	U	0	U	- 11	U	- 0	ii res
	-	Legal & Regulatory Suppor	11	0	0	0	0	11	0	34	36 Yes 11 Yes
Raymond Scott	024	Legal & Regulatory Profes	20 36	0	0	0	0	1	3	16 34	20 Yes 36 Yes
D	204	Land & Bandatan Barta	- 00			٥	0		3	40	00 1/
	•		22								
· · · · · · · · · · · · · · · · · · ·		Data Reporting	17	0	0	0	2	10	2	3	17 Yes
Tobin Page	055	Profitability Analytics	5	0	0	0	0	0	0	5	5 Yes
			94								
		IT Client Services	14	0	0	0	8	5	0	1	14 Yes
		IT Call Center Office	20	0	1	0	15	4	0	0	20 Yes
Jim Brewster	045	IT Service Support	60	4	5	0	6	32	0	13	60 Yes
WIIGHACH FICUIUNU	1 040	Accounting	122	0	٥	ا	U ₁	41	0	01	122 165
Michael Hedlund	040	Accounting	122	0	0	0	0	41	0	81	122 Yes
			372								
		Credit Operations	4	0	0	0	0	0	0	4	4 Yes
	048	Credit	93	0	0	0	0	0	4	89	93 Yes
		NMAC	12	12	0	0	0	0	0	0	12 Yes
		CC Call Center	15	15	0	0	0	0	0	0	15 Yes
	_	CC Funding	120	120	0	0	ol ol	0	0	0	120 Yes
		Funding Support	18	18	0	0	0	0	0	0	18 Yes
		Fifth Third	1 1	1	0	0	0	0	0	0	4 Yes
	_	Funding Direct Chrysler Subvention	11	11	0	0	0	0	0	0	11 Yes 1 Yes

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 297 of 377 PageID 1122

From: Nicole Heinicke <nheinicke@santanderconsumerusa.com>

To: Kristen Lagunes klagunes@santanderconsumerusa.com, Misty Donnell

<mdonnell@santanderconsumerusa.com>, Whitney Andres

<wandres@santanderconsumerusa.com>, Jeanette Rodriguez

<JRODRIGUEZ@santanderconsumerusa.com>, Reena Mathew

<rmathew@santanderconsumerusa.com>, Sabrina Boyd

<SBOYD@santanderconsumerusa.com>, Melissa Lawson

<MLAWSON@santanderconsumerusa.com>, Hortensia Perez

<hperez@santanderconsumerusa.com>

Cc: Angelina Hullum < AHULLUM@santanderconsumerusa.com >, Yessica Adriano

<YADRIANO@santanderconsumerusa.com>, Kayla Liggett

<kliggett@santanderconsumerusa.com>

Subject: RE: Headcount

Date: Mon, 02 Nov 2015 16:06:55 +0000

Importance: Normal

Attachments: Headcount_by_Department.xlsm

Hello!

We have updated the Headcount report for this week. Please let me know if you have any questions. It can be found in the headcount folder on the G Drive. (G:\HR Site Folders\NRH\Headcount)

Thanks! Nicole

Nicole Heinicke

Santander Consumer USA Inc. HR Generalist

PHONE 214.452.7016 MOBILE 214.212.8260

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 298 of 377 PageID 1123

							Location			Subtotal Match	Cobring Miety De	one Melices Whitney	Kriston Topovo	Icanotto
SVP	Cost Center	Departments	Headcount	Corporate A	rapahoe I Ara	apahoe II Le	Location wisville North	Richland Hills Remo	te Office Corporate T	Subtotal Match	Sabrina Misty Re 97 618 6	ena Melissa Whitne 40 398 690	Kristen Tensya 193 386	28
Mark Mooney	047	Reinstatements	45	0	2	8	3	32	0	0 45 Yes	! !		_	
		CC Reinstatements	10	0	0	0	10	0	0	0 10 Yes		Combined 3050		
		Recovery Operations Dealer Control	12 67	0	0	0	0	0	0	8 12 Yes 67 67 Yes				
		Collateral Recovery	47	0	0	0	14	33	0	0 47 Yes				
		CC Coll Recv	9	0	0	0	0	9	0	0 9 Yes				
		Non Collateral Deficiency	14	0	4	2	0	8	0	0 14 Yes				
		Vendor Oversight CC Vdr Oversight	41	0	0	0	4	35	0	2 41 Yes 0 6 Yes				
		CC var Oversigni	251	U	U]	U		4	O _I	0 o res				
Dominique Doyenard	031	Dialer Administration	10	6	0	0	4	0	0	0 10 Yes				
Dominique Doyenard	031	Business Process Optimization	9	0	0	0	1	7	1	0 9 Yes				
		Operational Analytics	10	0	0	0	5	0	5	0 10 Yes				
			29											
Linda Vrazel	031	Quality Assurance	53	1	0	0	0	0	1	51 53 Yes				
	-	CC Dealer Advocacy and Maintenance	18	0	0	0	10	0	0	18 18 Yes				
		Credit Bureau Advocacy Advocacy Analytics	18	0	0	0	0	0	0	8 18 Yes 0 1 Yes				
		Customer Advocacy	18	0	0	0	0	18	0	0 18 Yes				
			108											
Graham Anderson	036	Titles	85	0	0	15	0	70	0	0 85 Yes				
		CC Titles	10	0	0	0	0	10	0	0 10 Yes				
	-	Insurance CC Insurance	48 17	0	0	0	0	48 17	0	0 48 Yes 0 17 Yes				
		Account Services Unit ASU	45	0	0	0	0	45	0	0 45 Yes				
		CC Account Services Unit	6	0	0	0	0	6	0	0 6 Yes				
	050	Impounds	34	0	0	0	0	34	0	0 34 Yes				
		CC Impounds	252	0	0	0	0	7	0	0 7 Yes				
			202											
Scott Dieckman	047	Unsecured Credit Card	54 54	53	0	0	0	1	0	0 54 Yes				
			54											
James Hart	031	Quality Control	80	1	0	0	0	31	0	48 80 Yes				
		Strategic Operations	19 99	U	U	U	2	2	0	15 19 Yes				
Tamika Carr	034	Program Management Program Management CCAR	59	0	0	0	0	16	0	43 59 Yes				
		Program Management CCAR	60	0	U	υĮ	U]	U	U]	1 Yes				
Kina Theorem dules	046	Customer Consider	450	0	45	0	40	60		0 156 Yes				
Kim Thorndyke	046	Customer Service Customer Service Operations	156	0	45 0	0	0	5	0	0 156 Yes 0 5 Yes				
		OSP Vendor Management	5	0	1	0	1	1	2	0 5 Yes				
		CC Customer Service Support	215	0	32	0	55	128	0	0 215 Yes				
			381											
Brent Huisman	050	Asset Remarketing	64	0	1	4	1	55	2	1 64 Yes				
		CC Asset Remarketing	52	0	3	3	0	36	0	10 52 Yes				
	ļ	Auctions	5	0	0	0	0	2	3	0 5 Yes				
		CC Auctions	121	0	0	0	0	0	0	0 0 Yes				
Brad Quick	038 038	Specialized Services Cease and Desist	68	0	0	0	0	68	0	0 68 Yes 0 7es				
	035	Bankruptcy	98	0	8	7	0	83	0	0 98 Yes				
		CC Bankruptcy	7	0	0	0	0	7	0	0 7 Yes				
			173											
Wayne Nightengale	049	Late Stage	802	0	165	0	311	326	0	0 802 Yes				
		Early Stage	79	0	2	0	29	48	0	0 79 Yes				
		CC Late Stage CC Early Stage	166 186	0	77	0	85 70	70	0	0 166 Yes 0 186 Yes				
	1	Collections Operations	186	0	2	0	2	2	0	0 186 Yes				
			1239											
Scott Rundle	056	RL Orig Operations	2	1	0	0	0	1	0	0 2 Yes				
- Cook Rundio		RL Sales	27	0	0	0	0	25	2	0 27 Yes				
			29											
Tony Kutiper	054	Funding Operations	4	1	0	0	0	0	0	3 4 Yes				
Tony Kutiper	054	Funding Operations Core Funding	4 56	1 56	0	0	0	0	0	3 4 Yes 0 56 Yes				
Tony Kutiper	054	Funding Operations Core Funding Core Call Center CarMax	56 19	1 56 19	0 0	- 0	0		0	3 4 Yes 0 56 Yes 0 19 Yes 0 15 Yes				

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 299 of 377 PageID 1124

		т	otal	3476		Grav	Total	0	1	HX Total	426	
				U/								
		Ivehieviii		67	U	υĮ	U	U	111	U	U	11 1
	+	Legal & Regulatory Suppor Replevin		11	0	0	0	0	11	0	35	11 Y
Raymond Scott	024	Legal & Regulatory Profes		19 37	0	0	0	0	1	3	15 35	19 Ye 37 Ye
10 "	201	l. 100 11 0 1		10								40.14
	•	 	•	22	•			•				
		Data Reporting		17	0	0	0	2	10	2	3	17 Y
obin Page	055	Profitability Analytics		5	0	0	0	0	0	0	5	5 Y
				94								
		IT Client Services		15 94	0	0	0	9	5	0	1	15 Ye
		IT Call Center Office		20	0	1	0	15	4	0	0	20 Y
Jim Brewster	045	IT Service Support		59	3	5	0	6	32	0	13	59 Y
	1	ļ. 1222g		123				-		-		
Aichael Hedlund	040	Accounting		123	0	0	0	0	41	0	82	123 Ye
				3/4								
		Credit Operations		374	0	0	0	0	0	0	4	4 Y
	048	Credit		94	0	0	0	0	0	4	90	94 Y
		NMAC		12	12	0	0	0	0	0	0	12 Y
		CC Call Center		16	16	0	0	0	0	0	0	16 Ye
		CC Funding		120	120	0	0	0	0	0	0	120 Ye
	1	Funding Support		18	18	öl	ol ol	0	0	0	0	18 Ye
		Fifth Third		4	4	0	0	0	0	0	0	4 Ye
		Funding Direct Chrysler Subvention	_	11	11	0	0	0	0	0	0	11 Ye

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 300 of 377 PageID 1125

From: Nicole Heinicke <nheinicke@santanderconsumerusa.com>

To: Kristen Lagunes < klagunes @santanderconsumerusa.com>, Whitney Andres

<wandres@santanderconsumerusa.com>, Jeanette Rodriguez

<JRODRIGUEZ@santanderconsumerusa.com>, Reena Mathew

<rmathew@santanderconsumerusa.com>, Sabrina Boyd

<SBOYD@santanderconsumerusa.com>, Melissa Lawson

<MLAWSON@santanderconsumerusa.com>, Hortensia Perez

<hperez@santanderconsumerusa.com>

Cc: Angelina Hullum <AHULLUM@santanderconsumerusa.com>, Yessica Adriano

<YADRIANO@santanderconsumerusa.com>, Kayla Liggett

<kliggett@santanderconsumerusa.com>

Subject: Headcount

Date: Mon, 09 Nov 2015 20:14:24 +0000

Importance: Normal

Attachments: Headcount by Department.xlsm

Hello!

We have updated the Headcount report for this week. Please let me know if you have any questions. It can be found in the headcount folder on the G Drive. (G:\HR Site Folders\NRH\Headcount)

Thanks! Nicole

Nicole Heinicke

Santander Consumer USA Inc.

HR Generalist

PHONE 214.452.7016 MOBILE 214.212.8260

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 301 of 377 PageID 1126

							Lasation			Cubtatal Matab	Cabrina ODENI Dagas	Maliana Malaina	Vrieten Teneve	laanatta.
SVP	Cost Center	Departments	Headcount	Corporate A	rapahoe I Ara	apahoe II Le	Location ewisville North	Richland Hills Remo	ote Office Corporate TH	Subtotal Match X	Sabrina OPEN Reena 99 659 646	Melissa Whitney 384 706	Kristen Tensya 182 385	Jeanette 28
Mark Mooney	047	Reinstatements	45	0	2	8	3	32	0	0 45 Yes			'	
		CC Reinstatements	11 12	0	0	0	0	0		0 11 Yes		Combined 3089		
		Recovery Operations Dealer Control	67	0	0	0	0	0	0 6	8 12 Yes 67 Yes				
		Collateral Recovery	50	0	0	0	15	35	0	0 50 Yes				
		CC Coll Recv	11	0	0	0	0	11	0	0 11 Yes				
		Non Collateral Deficiency	15 51	0	4	3	0	8 45		0 15 Yes 2 51 Yes				
		Vendor Oversight CC Vdr Oversight	6	0	0	0	2	45	0	2 51 Yes 0 6 Yes				
		Joo var oversign	268	o o	<u> </u>	<u> </u>		-	0	0 100				
Dominique Doyenard	031	Dialer Administration	10	6	0	0	4	0	0	0 10 Yes				
Dominique Doyenard	031	Business Process Optimization	9	0	0	0	1	7		0 9 Yes				
		Operational Analytics	10	0	0	0	5	0		0 10 Yes				
			29						·					
Linda Vrazel	031	Quality Assurance	53	1	0	0	0	0	1	51 53 Yes				
Emad Videor		CC Dealer Advocacy and Maintenance	18	0	Ö	0	0	0		18 18 Yes				
		Credit Bureau Advocacy	19	0	0	0	10	0	0	9 19 Yes				
		Advocacy Analytics Customer Advocacy	18	0	0	0	0	1 18		0 1 Yes 0 18 Yes				
		Customer Advocacy	109	U	υĮ	U	U	10	U	U 16 Yes				
Graham Anderson	036	Titles	85	0	0	15	0	70		0 85 Yes				
		CC Titles Insurance	10 49	0	0	0	0	10 49		0 10 Yes 0 49 Yes				
		CC Insurance	18	0	0	0	0	18	0	0 49 Yes				
		Account Services Unit ASU	44	0	0	0	0	44	0	0 44 Yes				
		CC Account Services Unit	6	0	0	0	0	6		0 6 Yes				
	050	Impounds CC Impounds	35	0	0	0	0	35		0 35 Yes 0 6 Yes				
		ICC Impounds	253	U	υĮ	U	U	0	U	0 6 Yes				
Scott Dieckman	047	Unsecured Credit Card	54 54	53	0	0	0	1	0	0 54 Yes				
			54											
James Hart	031	Quality Control	78	1	0	0	0	30	0	78 Yes				
		Strategic Operations	19 97	0	0	0	2	2	0	19 Yes				
			97											
Tamika Carr	034	Program Management	14	0	0	0	0	7	0	7 14 Yes				
		Program Management CCAR	15	0	0	0	0	0	0	1 1 Yes				
			15											
Kim Thorndyke	046	Customer Service	162	0	39	0	44	79	0	0 162 Yes				
		Customer Service Operations	5	0	0	0	0	5	0	0 5 Yes				
		OSP Vendor Management	5	0	1	0	1	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		0 5 Yes				
		CC Customer Service Support	233 405	0	38	U	55	140	U	0 233 Yes				
			100											
Brent Huisman	050	Asset Remarketing	62	0	1	0	1	56	3	1 62 Yes				
		CC Asset Remarketing Auctions	64 30	0	3	6	9	36	28	0 64 Yes 0 30 Yes				
		CC Auctions	0	0	0	0	0	0		0 0 Yes				
		100.000	156						-					
Beed Outels	020	Considered Complete	60	0	0	0	0	60	0	0 68 Yes				
Brad Quick	038 038	Specialized Services Cease and Desist	68	0	0	0	0	68		0 68 Yes 0 7es				
	035	Bankruptcy	97	0	8	7	0	82	0	0 97 Yes				
		CC Bankruptcy	7	0	0	0	0	7	0	0 7 Yes				
			172											
Wayne Nightengale	049	Late Stage	768	0	137	0	310	321	0	0 768 Yes				
, ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		Early Stage	110	0	35	0	27	48	0	0 110 Yes				
		CC Late Stage	165	0	11	0	83	71	0	0 165 Yes				
		CC Early Stage Collections Operations	165	0	58	0	70	37		0 165 Yes 0 6 Yes				
	1	Toolections Operations	1214	U	2	U	۷		- 0	o res				
Scott Rundle	056	RL Orig Operations	2	1	0	0	0	1	-	0 2 Yes				
	1	RL Sales	27 29	0	0	0	0	25	2	0 27 Yes				
			23											
Tony Kutiper	054	Funding Operations	4	1	0	0	0	0	0	3 4 Yes				
<u> </u>		Core Funding	55 19	55 19	0	0	0	0	0	0 55 Yes				
		Core Call Center CarMax	19	15	0	0	0	0	0	0 19 Yes 0 15 Yes				
L	-	1-					-	-						

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 302 of 377 PageID 1127

		-	Total	3481		Grav	Total	0	т	HX Total	392	
				31								
		Irrebieviii		67	U]	U	U	U _I	111	U	- 0	11 16
	+	Replevin	_	11	0	0	0	0	11	0	35	37 TE
aymonu Scott	024	Legal & Regulatory Profes Legal & Regulatory Suppor	_	37	0	0	0	0	1	3	15 35	37 Ye
aymond Scott	024	Land & Damilatani Brafas		19	0	0	0	0	4	3	45	19 Ye
	•	•		22				·	-	_		
-		Data Reporting		17	0	0	0	2	10	2	3	17 Ye
obin Page	055	Profitability Analytics		5	0	0	0	0	0	0	5	5 Y
				94								
		IT Client Services		15	0	0	0	9	5	0	1	15 Ye
		IT Call Center Office		20	0	1	0	15	4	0	0	20 Ye
im Brewster	045	IT Service Support		59	3	5	0	6	32	0	13	59 Ye
ilonaci i icaiana	1 040	recounting		124		۰	<u> </u>	o l	40	91	04	124 10
lichael Hedlund	040	Accounting		124	0	0	0	0	40	0	84	124 Ye
				373								
		Credit Operations		4	0	0	0	0	0	0	4	4 Ye
	048	Credit		94	0	0	0	0	0	4	90	94 Ye
		NMAC		12	12	0	0	0	0	0	0	12 Ye
		CC Call Center		16	16	0	0	0	0	0	0	16 Ye
		CC Funding		120	120	0	0	ol ol	0	0	0	120 Ye
		Funding Support		18	18	0	0	0	0	0	0	18 Ye
		Fifth Third		4	1	0	0	0	0	0	0	4 Ye
		Funding Direct Chrysler Subvention	_	11	11	0	0	0	0	0	0	11 Ye

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 303 of 377 PageID 1128

From: Nicole Heinicke <nheinicke@santanderconsumerusa.com>

To: Kristen Lagunes < klagunes @santanderconsumerusa.com>, Whitney Andres

<wandres@santanderconsumerusa.com>, Jeanette Rodriguez

<JRODRIGUEZ@santanderconsumerusa.com>, Reena Mathew

<rmathew@santanderconsumerusa.com>, Sabrina Boyd

<SBOYD@santanderconsumerusa.com>, Melissa Lawson

<MLAWSON@santanderconsumerusa.com>, Hortensia Perez

<hperez@santanderconsumerusa.com>

Cc: Angelina Hullum <AHULLUM@santanderconsumerusa.com>, Yessica Adriano

<YADRIANO@santanderconsumerusa.com>, Kayla Liggett

<kliggett@santanderconsumerusa.com>

Subject: RE: Headcount

Date: Mon, 16 Nov 2015 16:26:00 +0000

Importance: Normal

Attachments: Headcount by Department.xlsm

Hello!

We have updated the Headcount report for this week. Please let me know if you have any questions. It can be found in the headcount folder on the G Drive. (G:\HR Site Folders\NRH\Headcount)

Thanks! Nicole

Nicole Heinicke

Santander Consumer USA Inc.

HR Generalist

PHONE 214.452.7016 MOBILE 214.212.8260

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 304 of 377 PageID 1129

							Location			Subtatal Matab	Sabrina OPEN Reena	Moligge Militage	Vrieton Topovo	Iconotto
SVP	Cost Center	Departments	Headcount	Corporate A	rapahoe I Ara	apahoe II Le	Location ewisville North	Richland Hills Remo	te Office Corporate TH	Subtotal Match X	99 658 661	Melissa Whitney 396 702	Kristen Tensya 180 384	28
Mark Mooney	047	Reinstatements	45	0	2	8	3	32	0	0 45 Yes				
		CC Reinstatements	11 12	0	0	0	11	0		0 11 Yes		Combined 3108		
		Recovery Operations Dealer Control	66	0	0	0	0	0		8 12 Yes 66 Yes				
		Collateral Recovery	50	0	0	0	15	35		0 50 Yes				
		CC Coll Recv	11	0	0	0	0	11	0	0 11 Yes				
		Non Collateral Deficiency	15	0	4	3	0	8		0 15 Yes				
		Vendor Oversight CC Vdr Oversight	52 6	0	0	0	4	46	0	2 52 Yes 0 6 Yes				
		CC var Oversigni	268	U	U]	U		4	U .	0 o res				
Dominique Doyenard	031	Dialer Administration	10	6	0	0	4	0	0	0 10 Yes				
Dominique Doyenaru	031	Business Process Optimization	9	0	0	0	1	7		0 9 Yes				
		Operational Analytics	10	0	0	0	5	0		0 10 Yes				
			29											
Linda Vrazel	031	Quality Assurance	53	0	0	0	0	0		52 53 Yes				
		CC Dealer Advocacy and Maintenance	17	0	0	0	10	0		17 17 Yes				
		Credit Bureau Advocacy Advocacy Analytics	19	0	0	0	10	0	0	9 19 Yes 0 1 Yes				
		Customer Advocacy	17	0	0	0	0	17		0 17 Yes				
			107											
Graham Anderson	036	Titles	85	0	0	15	0	70		0 85 Yes				
	-	CC Titles Insurance	10 50	0	0	0	0	10 50		0 10 Yes 0 50 Yes				
		CC Insurance	18	0	0	0	0	18	0	0 18 Yes				
		Account Services Unit ASU	44	0	0	0	0	44	0	0 44 Yes				
		CC Account Services Unit	6	0	0	0	0	6	0	0 6 Yes				
	050	Impounds	35	0	0	0	0	35		0 35 Yes				
		CC Impounds	254	0	0]	0	0	6	0	0 6 Yes				
0 " 0"	0.45	In the state of					٥							
Scott Dieckman	047	Unsecured Credit Card	54 54	53	0	0	0	1	0	0 54 Yes				
lamas I last	024	Ovelity Control	70	4	0	0	٥	30		47 78 Yes				
James Hart	031	Quality Control Strategic Operations	78 19	0	0	0	2	2	0	78 Yes 15 19 Yes				
		1-1-1-1	97		-,	-		_						
Tamika Carr	034	Program Management	14	٥١	0	0	0	7	0	7 14 Yes				
Tallika Call	034	Program Management CCAR	1	0	0	0	0	0	0	1 1 Yes				
			15				-							
Kim Thorndyke	046	Customer Service	171	0	48	0	44	70	0	0 171 Yes				
Kiiii Tiloilidyke	040	Customer Service Operations	5	0	0	0	0	5		0 5 Yes				
		OSP Vendor Management	5	0	1	0	1	1	2	0 5 Yes				
		CC Customer Service Support	238	0	44	0	55	139	0	0 238 Yes				
			419											
Brent Huisman	050	Asset Remarketing	60	0	1	0	1	54	3	1 60 Yes				
		CC Asset Remarketing	65 30	0	3	6	8	38	0	10 65 Yes				
		Auctions		0	0	0	0	2		0 30 Yes				
		CC Auctions	155	0	0	U	0	U]	U	0 0 Yes				
Dec 4 Octob	000	In the state of th		0	٥	0	٥	25	2	05 V				
Brad Quick	038 038	Specialized Services Cease and Desist	65 0	0	0	0	0	65		0 65 Yes 0 7es				
	035	Bankruptcy	97	0	8	7	0	82	0	0 97 Yes				
		CC Bankruptcy	7 169	0	0	0	0	7	0	0 7 Yes				
			169											
Wayne Nightengale	049	Late Stage	766	0	137	0	310	319	0	0 766 Yes				
		Early Stage	115	0	31	0	37	47		0 115 Yes				
	-	CC Late Stage CC Early Stage	165 172	0	11 59	0	83 76	71	0	0 165 Yes 0 172 Yes				
		Collections Operations	6	0	2	0	2	2		0 172 Tes 0 6 Yes				
			1224						<u></u>					
Scott Rundle	056	RL Orig Operations	2	1	0	0	0	1	0	0 2 Yes				
		RL Sales	27	0	0	0	0	25	-	0 27 Yes				
			29											
Tony Kutiper	054	Funding Operations	4	1	0	0	0	0	0	3 4 Yes				
		Core Funding	60	60	0	0	0	0	0	0 60 Yes				
	-	Core Call Center CarMax	19 15	19	0	0	0	0	0	0 19 Yes 0 15 Yes				
		Cariviax	15	10	U	U	U	U	U	io res				

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 305 of 377 PageID 1130

	048	Credit	95	0	0)	0	4	91	9
	040	Credit Operations	4	0	0			1	0	0	4	8
			373									
Michael Hedlund	040	Accounting	123	0	0	C	0		40	0	83	12
			123									
Jim Brewster	045	IT Service Support	58	3	5) 6		31	0	13	
		IT Call Center Office	20	0	1				4	0	- 0	2
		IT Client Services	15	0	0	1 0	9	<u>, </u>	5	0	1	
			93									
Tobin Page	055	Profitability Analytics	5	0	0		0 0		0	0	5	
TODITT age	000	Data Reporting	17	0	0			,	10	2	- 3	1
	1	Data Reporting	 22	۰,			4	<u> </u>	10		<u>`</u>	
Raymond Scott	024	Legal & Regulatory Profes	19	0	0		0 0		1	3	15	1
•		Legal & Regulatory Suppor	37	0	0	0	0)	1	1	35	3
		Replevin	11	0	C	0) (0	11	0	0	1
		·	67									

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 306 of 377 PageID 1131

From: Nicole Heinicke <nheinicke@santanderconsumerusa.com>

To: Kristen Lagunes klagunes@santanderconsumerusa.com, Whitney Andres

<wandres@santanderconsumerusa.com>, Jeanette Rodriguez

<JRODRIGUEZ@santanderconsumerusa.com>, Reena Mathew

<rmathew@santanderconsumerusa.com>, Sabrina Boyd

<SBOYD@santanderconsumerusa.com>, Melissa Lawson

<MLAWSON@santanderconsumerusa.com>, Hortensia Perez

<hperez@santanderconsumerusa.com>

Cc: Angelina Hullum <AHULLUM@santanderconsumerusa.com>, Yessica Adriano

<YADRIANO@santanderconsumerusa.com>, Kayla Liggett

<kliggett@santanderconsumerusa.com>

Subject: Headcount

Date: Mon, 23 Nov 2015 15:37:28 +0000

Importance: Normal

Attachments: Headcount by Department.xlsm

Hello!

We have updated the Headcount report for this week. Please let me know if you have any questions. It can be found in the headcount folder on the G Drive. (G:\HR Site Folders\NRH\Headcount)

Thanks! Nicole

Nicole Heinicke

Santander Consumer USA Inc.

HR Generalist

PHONE 214.452.7016 MOBILE 214.212.8260

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 307 of 377 PageID 1132

							Location	1			Subtotal Match	Sabrina OPEN Reena Melissa Whitney Kristen Tensya Jeanette
SVP	Cost Center	Departments	Headcount	Corporate /	Arapahoe I A	rapahoe II L		n Richland Hills	Remote Office		Oubiolai iviatori	98 655 658 390 698 189 382 28
Mark Mooney		Reinstatements	45	0	2	8	3	32	0	0	45 Yes	
		CC Reinstatements	11 12	0	0	0	11	0	0	0 9	11 Yes 12 Yes	Combined 3098
		Recovery Operations Dealer Control	66	0	0	0	0	0	0	66	66 Yes	
		Collateral Recovery	66 50	0	0	0	15	35	0	0	50 Yes	
		CC Coll Recv	11	0	0	0	0	11	0	0	11 Yes	
		Non Collateral Deficiency	15	0	4	3	0	8	0	0	15 Yes	
		Vendor Oversight	52	0	0	0	4	46	0	2	52 Yes	
		CC Vdr Oversight	268	0	0	U	2	4	0	0	6 Yes	
			200									
Dominique Doyenard	031	Dialer Administration	10	6	0	0	4	0	0	0	10 Yes	
		Business Process Optimization Operational Analytics	10	0	0	0	1	7 0	1	0	9 Yes 10 Yes	
		Operational Analytics	29	U	U	U	3	U	5	0	10 Tes	
Linda Vrazel	031	Quality Assurance	52	0	0	0	0	0	1	51	52 Yes	
		CC Dealer Advocacy and Maintenance Credit Bureau Advocacy	18 19	0	0	0	10	0	0	18 9	18 Yes 19 Yes	
		Advocacy Analytics	13	0	0	0	0	1	0	0	1 Yes	
		Customer Advocacy	17	0	0	0	0	17	0	0	17 Yes	
			107									
Graham Anderson	036	Titles	79	0	٥	15	0	64	0	0	79 Yes	
Granam Anderson	030	CC Titles	16	0	0	0	0	16	0	0	16 Yes	
		Insurance	50	0	0	0	0	50	0	0	50 Yes	
		CC Insurance	18	0	0	0	0	18	0	0	18 Yes	
		Account Services Unit ASU CC Account Services Unit	44	0	0	0	0	44	0	0	44 Yes 6 Yes	
	050	Impounds	35	0	0	0	0	35	0	0	35 Yes	
		CC Impounds	6	0	0	0	0	6	0	0	6 Yes	
			254									
Scott Dieckman	047	Unsecured Credit Card	53	52	0	0	0	1	0	0	53 Yes	
Ocott Dieckinan	047	Onsecured Credit Card	53	52	o _l	0	O ₁	'	U U		33 163	
	004	la manda									=0.17	
James Hart		Quality Control Strategic Operations	78 19	0	0	0	2	30	0	47 15	78 Yes 19 Yes	
		Offategie Operations	97	•	0	o l	2	2	· ·	10	10 100	
Tamika Carr	034	Program Management	43	0	0	0	0	16	0	27	43 Yes	
		Program Management CCAR	44	U	0	0]	0	0	0	1	1 Yes	
Kim Thorndyke	046	Customer Service	169	0	46	0	44	79	0	0	169 Yes	
		Customer Service Operations	5	0	0	0	0	5	0	0	5 Yes	
		OSP Vendor Management CC Customer Service Support	235	0	43	0	54	138	2	0	5 Yes 235 Yes	
		CC Customer Service Support	414	O O	45	U U	34	130	U_		200 163	
Brent Huisman	050	Asset Remarketing	54	0	0	0	0	51	3	0	54 Yes	
		CC Asset Remarketing Auctions	72 30	0	3	7	11	40	28	11 0	72 Yes 30 Yes	
		CC Auctions	0	0	0	0	0	0	0	0	0 Yes	
		1	156									
D. J.O. J.J.	000	lot-Pt-0t	0.5	0	٥	0		0.5	0	0	05 1/	
Brad Quick	038 038	Specialized Services Cease and Desist	65	0	0	0	0	65	0	0	65 Yes 0 Yes	
		Bankruptcy	96	0	8	7	0	81	0	0	96 Yes	
		CC Bankruptcy	7	0	0	0	0	7	0	0	7 Yes	
			168									
Wayne Nightengale	049	Late Stage	763	0	136	0	309	318	0	0	763 Yes	
ayno mgntengale	J43	Early Stage	104	0	31	0	27	46	0	0	104 Yes	
		CC Late Stage	165 176	0	11	0	83	71	0	0	165 Yes	
		CC Early Stage	176	0	57	0	83	36	0	0	176 Yes	
		Collections Operations	1214	0	2	0	2	2	0	0	6 Yes	
			1214									
Scott Rundle		RL Orig Operations	2	1	0	0	0	1	0	0	2 Yes	
		RL Sales	27	0	0	0	0	25	2	0	27 Yes	
			29									
Tony Kutiper	054	Funding Operations	4	1	0	0	0	0	0	3	4 Yes	
			60	60	0	0	0	0	0	0	60 Yes	
		Core Funding	00									
		Core Call Center CarMax	20	20	0	0	0	0	0	0	20 Yes 14 Yes	

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 308 of 377 PageID 1133

		Tota	al 3509		Grav	Total	0	-	HX Total	411	
			07								
		Inebieviii	67	U	U	U	U	111	U	- 0	ii res
		Replevin	11	0	0	0	0	11	0	35	11 Yes
Raymond Scott	024	Legal & Regulatory Profes Legal & Regulatory Suppor	37	0	0	0	0	1	1	15 35	37 Yes
Daymand Coatt	024	Land 9 Danislatan Brafas	19	0	0	ol	0	4	3	15	19 Yes
	•		22		•		•				
_		Data Reporting	17	0	0	0	2	10	2	3	17 Yes
Tobin Page	055	Profitability Analytics	5	0	0	0	0	0	0	5	5 Yes
			93								
		IT Client Services	15	0	0	0	9	5	0	1	15 Yes
		IT Call Center Office	20	0	1	0	15	4	0	0	20 Yes
Jim Brewster	045	IT Service Support	58	3	5	0	6	31	0	13	58 Yes
			123								
Michael Hedlund	040	Accounting	123	0	0	0	0	40	0	83	123 Yes
	0.10		100		2	0	0	40	0	00	100 17
		, ,	371								
	1	Credit Operations	4	0	0	0	0	0	0	4	4 Yes
	048	Credit	94	0	0	0	0	0	4	90	94 Yes
		NMAC	12	12	0	0	0	0	0	0	12 Yes
	_	CC Funding CC Call Center	119 16	16	0	0	0	0	0	0	119 Yes 16 Yes
		Funding Support		119	0	0	0	0	0	0	17 Yes
		Fifth Third	17	17	0	0	0	0	0	0	0 Yes
		Chrysler Subvention	0	0	0	0	0	0	0	0	0 Yes
		Funding Direct	11	11	0	0	0	0	0	0	11 Yes

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 309 of 377 PageID 1134

From: Nicole Heinicke <nheinicke@santanderconsumerusa.com>

To: Kristen Lagunes klagunes@santanderconsumerusa.com, Whitney Andres

<wandres@santanderconsumerusa.com>, Jeanette Rodriguez

<JRODRIGUEZ@santanderconsumerusa.com>, Reena Mathew

<rmathew@santanderconsumerusa.com>, Sabrina Boyd

<SBOYD@santanderconsumerusa.com>, Melissa Lawson

<MLAWSON@santanderconsumerusa.com>, Hortensia Perez

<hperez@santanderconsumerusa.com>

Cc: Angelina Hullum <AHULLUM@santanderconsumerusa.com>, Yessica Adriano

<YADRIANO@santanderconsumerusa.com>, Kayla Liggett

<a href="mailto: kliggett@santanderconsumerusa.com, Stephanie Elad

<selad@santanderconsumerusa.com>

Subject: Headcount

Date: Mon, 30 Nov 2015 22:45:56 +0000

Importance: Normal

Attachments: Headcount by Department.xlsm

Hello!

We have updated the Headcount report for this week. Please let me know if you have any questions. It can be found in the headcount folder on the G Drive. (G:\HR Site Folders\NRH\Headcount)

Thanks! Nicole

Nicole Heinicke

Santander Consumer USA Inc. HR Generalist

PHONE 214.452.7016 MOBILE 214.212.8260

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 310 of 377 PageID 1135

							Location			Subtatal Matab	Sabrina OPEN Reena	Molioco Whitney	Kriston Tonovo I	loopotto
SVP	Cost Center	Departments	Headcount	Corporate Ar	rapahoe I Ara	pahoe II Le	Location wisville North	Richland Hills Remo	ote Office Corporate T	Subtotal Match	97 650 652	Melissa Whitney 416 702	Kristen Tensya J 193 381	28
Mark Mooney	047	Reinstatements	45	0	2	8	3	32	0	0 45 Yes	1			
		CC Reinstatements	11 12	0	0	0	11	0	0	0 11 Yes		Combined 3119		
		Recovery Operations Dealer Control	67	0	0	0	0	0	0	9 12 Yes 67 67 Yes				
		Collateral Recovery	48	0	0	0	14	34	0	0 48 Yes				
		CC Coll Recv	11	0	0	0	0	11	0	0 11 Yes				
		Non Collateral Deficiency	12	0	4	4	0	4	0	0 12 Yes				
		Vendor Oversight CC Vdr Oversight	52 6	0	0	0	4	46	0	2 52 Yes 0 6 Yes				
	1	CC var Oversigni	264	0	U	U		4	U	0 6 fes				
Dominique Doyenard	031	Dialer Administration	10	6	0	0	4	0	0	0 10 Yes				
Dominique Doyenard	031	Business Process Optimization	8	0	0	0	1	6	1	0 8 Yes				
		Operational Analytics	11	0	0	0	5	1	5	0 11 Yes				
			29											
Linda Vrazel	031	Quality Assurance	51	0	0	0	0	0	1	50 51 Yes				
		CC Dealer Advocacy and Maintenance	18	0	0	0	10	0	0	18 18 Yes				
		Credit Bureau Advocacy Advocacy Analytics	19	0	0	0	10	0	0	9 19 Yes 0 1 Yes				
		Customer Advocacy	20	0	0	0	0	20	0	0 20 Yes				
			109											
Graham Anderson	036	Titles	82	0	0	20	0	62	0	0 82 Yes				
		CC Titles Insurance	16 50	0	0	0	0	16 50	0	0 16 Yes 0 50 Yes				
		CC Insurance	18	0	0	0	0	18	0	0 50 Yes 0 18 Yes				
		Account Services Unit ASU	43	0	0	0	0	43	0	0 43 Yes				
		CC Account Services Unit	6	0	0	0	0	6	0	0 6 Yes				
	050	Impounds	38	0	0	0	0	38	0	0 38 Yes				
		CC Impounds	260	0	0	0	0	7	0	0 7 Yes				
Scott Dieckman	047	Unsecured Credit Card	52 52	51	0	0	0	1	0	0 52 Yes				
	201					0		00		10 =0 V				
James Hart	031	Quality Control Strategic Operations	79 19	0	0	0	2	30	0	48 79 Yes 15 19 Yes				
	-	Cuategio Operations	98			O ₁			· ·	10 10 100				
Tamika Carr	034	Program Management Program Management CCAR	44	0	0	0	0	17	0	27 44 Yes 1 1 Yes				
	1	Frogram Management CCAR	45		υĮ	U	U	U	U	1 1 Yes				
King Thomas I de	0.40	0	470		40	0	40	00		470 \/				
Kim Thorndyke	046	Customer Service Customer Service Operations	173	0	42 0	0	42 0	5	0	0 173 Yes 0 5 Yes				
		OSP Vendor Management	5	0	1	0	1	1	2	0 5 Yes				
		CC Customer Service Support	235	0	41	0	55	139	0	0 235 Yes				
			418					·	·					
Brent Huisman	050	Asset Remarketing	53	0	٥١	0	0	50	3	0 53 Yes				
Drone Fraidman	1 000	CC Asset Remarketing		0	3	7	11	41	0	11 73 Yes				
		Auctions	73 30	0	0	0	0	2	28	0 30 Yes				
		CC Auctions	156	0	0	0	0	0	0	0 0 Yes				
			100											
Brad Quick		Specialized Services	64	0	0	0	0	64	0	0 64 Yes 0 0 Yes				
	038	Cease and Desist Bankruptcy	96	0	0	7	0	81	0	0 0 Yes 0 96 Yes				
	033	CC Bankruptcy	7	0	0	0	0	7	0	0 7 Yes				
	•		167				'	•	'					
Wayne Nightengale	049	Late Stage	753	0	134	0	308	311	0	0 753 Yes				
		Early Stage	132	0	59	0	27	46	0	0 132 Yes				
		CC Late Stage	166	0	11	0	84	71	0	0 166 Yes				
		CC Early Stage	173	0	57	0	80	36	0	0 173 Yes				
	1	Collections Operations	1230	0	2	U	2	2	0	0 6 Yes				
Contt Dund	050	DI Oria Occuptions			۸	٥١	0		0	0 0 1/				
Scott Rundle	056	RL Orig Operations RL Sales	27	1	0	0	0	1 25	0	0 2 Yes 0 27 Yes				
		The Guido	29	J		- U	0	20		2/ 165				
	054	Funding Operations	1	1	٥١	٥١	٥١	0	0	3 4 Yes				
Tony Kutiner						UI			UI UI	4 165				
Tony Kutiper	054	Core Funding	60	60	0	0	0	0	0	0 60 Yes				
Tony Kutiper	054	Core Call Center CarMax	60 20 14	60 20	0	0	0	0	0	0 60 Yes 0 20 Yes 0 14 Yes				

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 311 of 377 PageID 1136

		Tota	ıl 3530		Gray T		0		THX Total	411	
			01								
		repievin	67	0	U	U	U	11	U	- 0	11 Yes
		Legal & Regulatory Suppor Replevin	11	0	0	0	0	11	0	35	37 Yes 11 Yes
Raymond Scott	024	Legal & Regulatory Profes	19 37	0	0	0	0	1	3	15	19 Yes
			22								
		Data Reporting	17 22	0	0	0	2	10	2	3	17 Yes
Γobin Page	055	Profitability Analytics	5	0	0	0	0	0	0	5	5 Yes
			92								
		TT Client Services	92	U	U	U	0	٦	U		14 Tes
		IT Call Center Office IT Client Services	14	0	0	0	15 8	5	0	- 0	20 Yes 14 Yes
Jim Brewster	045	IT Service Support	58 20	3	5	0	6	31	0	13	58 Yes
		1 3	122								
Michael Hedlund	040	Accounting	122	0	0	0	0	40	0	82	122 Yes
			370								
		Credit Operations	4	0	0	0	0	0	0	4	4 Yes
	048	Credit	94	0	0	0	0	0	4	90	94 Yes
		NMAC	12	12	0	0	0	0	0	0	12 Yes
		CC Call Center	16	16	0	0	0	0	0	0	16 Yes
		CC Funding	119	119	0	0	0	0	0	0	119 Yes
		Funding Support	16	16	ol o	0	0	0	0	0	16 Yes
		Fifth Third	0	0	0	0	0	0	0	0	0 Yes
		Funding Direct Chrysler Subvention	11	11	0	0	0	0	0	0	11 Yes 0 Yes

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 312 of 377 PageID 1137

From: Nicole Heinicke <nheinicke@santanderconsumerusa.com>

To: Kristen Lagunes klagunes@santanderconsumerusa.com>, Whitney Andres

<wandres@santanderconsumerusa.com>, Jeanette Rodriguez

<JRODRIGUEZ@santanderconsumerusa.com>, Reena Mathew

<rmathew@santanderconsumerusa.com>, Sabrina Boyd

<SBOYD@santanderconsumerusa.com>, Melissa Lawson

<MLAWSON@santanderconsumerusa.com>, Hortensia Perez

<hperez@santanderconsumerusa.com>

Cc: Angelina Hullum <AHULLUM@santanderconsumerusa.com>, Yessica Adriano

<YADRIANO@santanderconsumerusa.com>, Kayla Liggett

<a href="mailto: , Stephanie Elad

<selad@santanderconsumerusa.com>, Edward Fabritiis

<efabritiis@santanderconsumerusa.com>

Subject: Headcount

Date: Mon, 07 Dec 2015 20:21:04 +0000

Importance: Normal

Attachments: Headcount_by_ Department.xlsm

Hello!

We have updated the Headcount report for this week. Please let me know if you have any questions. It can be found in the headcount folder on the G Drive. (G:\HR Site Folders\NRH\Headcount)

Thanks! Nicole

Nicole Heinicke

Santander Consumer USA Inc.

HR Generalist

PHONE 214.452.7016 MOBILE 214.212.8260

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 313 of 377 PageID 1138

SVP	Cost Center	Departments	Headcount	Corporate A	rapahoe I Ara	apahoe II Le	Location ewisville North	n Richland Hills Remo	ote Office Corporate THX	Subtotal Match	Sabrina OPEN Reer 96 653 649		192 3	nsya Jeanette 79 28
Mark Mooney	047	Reinstatements	45	0	2	8	3	32	0 0	45 Yes				
		CC Reinstatements	11	0	0	0	11	0	0 0	11 Yes		Combined 3103		
		Recovery Operations	13 67	0	0	0	0	4	0 9	13 Yes				
		Dealer Control Collateral Recovery	48	0	0	0	14	34	0 67	67 Yes 48 Yes				
		CC Coll Recv	11	0	0	0	0	11	0 0	11 Yes				
		Non Collateral Deficiency	12	0	4	4	0	4	0 0	12 Yes				
		Vendor Oversight	52	0	0	0	4	46	0 2	52 Yes				
	l	CC Vdr Oversight	265	0	0	0	2	4	0 0	6 Yes				
						_								
Dominique Doyenard	031	Dialer Administration	10	6	0	0	4	0	0 0	10 Yes 7 Yes				
		Business Process Optimization Operational Analytics	12	0	0	0	6	6	5 0	12 Yes				
		1	29											
Linda Marani	004	O I't. A	54	0		0	0			51 Yes				
Linda Vrazel	031	Quality Assurance CC Dealer Advocacy and Maintenance	51 18	0	0	0	0	0	0 18	18 Yes				
		Credit Bureau Advocacy	18	0	0	0	10	0	0 8	18 Yes				
		Advocacy Analytics	1	0	0	0	0	1	0 0	1 Yes				
		Customer Advocacy	20	0	0	0	0	20	0 0	20 Yes				
			108											
Graham Anderson	036	Titles	82 15	0	0	20	0	62	0 0	82 Yes				
		CC Titles	15 49	0	0	0	0	15 49	0 0	15 Yes				
		Insurance CC Insurance	18	0	0	0	0	18	0 0	49 Yes 18 Yes				
		Account Services Unit ASU	43	0	0	0	0	43	0 0	43 Yes				
		CC Account Services Unit	6	0	0	0	0	6	0 0	6 Yes				
	050	Impounds	40	0	0	0	0	40	0 0	40 Yes				
		CC Impounds	260	0	0	0	0	7	0 0	7 Yes				
			200											
Scott Dieckman	047	Unsecured Credit Card	52	51	0	0	0	1	0 0	52 Yes				
			52											
James Hart	031	Quality Control	78	1	0	0	0	29	0 48	78 Yes				
		Strategic Operations	19	0	0	0	2	2	0 15	19 Yes				
			97											
Tamika Carr	034	Program Management	46	0	0	0	0	17	0 29	46 Yes				
		Program Management CCAR	1	0	0	0	0	0	0 1	1 Yes				
			47											
Kim Thorndyke	046	Customer Service	172	0	42	0	42	88	0 0	172 Yes				
,		Customer Service Operations	5	0	0	0	0	5	0 0	5 Yes				
		OSP Vendor Management	5	0	1	0	1	1	2 0	5 Yes				
		CC Customer Service Support	233 415	0	41	0	54	138	0 0	233 Yes				
			415											
Brent Huisman	050	Asset Remarketing	54	0	0	0	0	51	3 0	54 Yes				
		CC Asset Remarketing	77	0	3	10	11	41	0 12	77 Yes				
		Auctions CC Auctions	30	0	0	0	0	2	0 0	30 Yes 0 Yes				
		CC Auctions	161	U	υĮ	U	U	υĮ	0 0	0 res				
Brad Quick	038 038	Specialized Services Cease and Desist	64	0	0	0	0	64	0 0	64 Yes 0 Yes				
	035	Bankruptcy	97	0	8	7	0	82	0 0	97 Yes				
		CC Bankruptcy	7	0	0	0	0	7	0 0	7 Yes				
			168											
Wayne Nightengale	049	Late Stage	754	0	141	0	308	305	0 0	754 Yes				
		Early Stage	112	0	40	0	25	47	0 0	112 Yes				
		CC Late Stage	167	0	11	0	84	72	0 0	167 Yes				
		CC Early Stage	177	0	61	0	80	36	0 0	177 Yes				
		Collections Operations	1214	0	1	U	1	2	0 0	4 Yes				
			.2.14											
Scott Rundle	056	RL Orig Operations	2	1	0	0	0	1	0 0	2 Yes				
		RL Sales	27	0	0	0	0	25	2 0	27 Yes				
			29											
Tony Kutiper	054	Funding Operations	4	1	0	0	0	0	0 3	4 Yes				
		Core Funding	60	60	0	0	0	0	0 0	60 Yes				
		Core Call Center CarMax	14	20	0	0	0	0	0 0	22 Yes 14 Yes				
		1	1.4	17			٠,	o o	, U					

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 314 of 377 PageID 1139

Raymond Scott	024	Legal & Regulatory Profes		19	0	0	0	0	4	2	15
			•	22	•				•		
		Data Reporting		17	0	0	0	2	10	2	3
Tobin Page	055	Profitability Analytics		5	0	0	0	0	0	0	5
				92							
		IT Client Services		14	0	0	0	8	5	0	1
		IT Call Center Office		20	0	1	0	15	4	0	0
Jim Brewster	045	IT Service Support		58	3	5	0	6	31	0	13
monaci i logidila	1 0.0	7 tood arting		119	• • • • • • • • • • • • • • • • • • • •		<u> </u>	٠		0	
Michael Hedlund	040	Accounting		119	0	0	0	0	40	0	79
				370							
		Credit Operations		4	0	0	0	0	0	0	4
	048	Credit		95	0	0	0	0	0	4	91
		NMAC		12	12	0	0	0	0	0	0
		CC Call Center		14	14	0	0	0	0	0	0
		CC Funding		118	118	Ö	0	0	0	0	0
		Funding Support		16	16	ől	0	0	0	0	0
		Fifth Third		0	0	o o	0	0	0	0	0
		Funding Direct Chrysler Subvention		11	11	0	0	0	0	0	0

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 315 of 377 PageID 1140

From: Nicole Heinicke <nheinicke@santanderconsumerusa.com>

To: Kristen Lagunes klagunes@santanderconsumerusa.com, Whitney Andres

<wandres@santanderconsumerusa.com>, Jeanette Rodriguez

<JRODRIGUEZ@santanderconsumerusa.com>, Reena Mathew

<rmathew@santanderconsumerusa.com>, Sabrina Boyd

<SBOYD@santanderconsumerusa.com>, Melissa Lawson

<MLAWSON@santanderconsumerusa.com>, Hortensia Perez

<hperez@santanderconsumerusa.com>

Cc: Angelina Hullum <AHULLUM@santanderconsumerusa.com>, Yessica Adriano

<YADRIANO@santanderconsumerusa.com>, Kayla Liggett

<a href="mailto:kliggett@santanderconsumerusa.com>, Stephanie Elad

<selad@santanderconsumerusa.com>, Edward Fabritiis

<efabritiis@santanderconsumerusa.com>

Subject: Headcount

Date: Tue, 15 Dec 2015 18:39:22 +0000

Importance: Normal

Attachments: Headcount_by_Department.xlsm

Hello!

We have updated the Headcount report for this week. Please let me know if you have any questions. It can be found in the headcount folder on the G Drive. (G:\HR Site Folders\NRH\Headcount)

Thanks! Nicole

Nicole Heinicke

Santander Consumer USA Inc.

HR Generalist

PHONE 214.452.7016 MOBILE 214.212.8260

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 316 of 377 PageID 1141

SVP	Cost Center	Departments	Headcount	Corporate	Arapahoe I	Arapahoe II	l ewisville	Location Mesa AZ	North Richland Hills	Remote Office	Corporate THX	Subtotal Match	Sabrina OPEN Reena 96 648 749	Melissa V	689 193	n Tensya Jeanett
Mark Mooney		Reinstatements	45	0		2 8	3	0	32	C		45 Yes	00 010 710			200 20
		CC Reinstatements	11	0		0	11	0	0	C	0			Combined	3099	
		Recovery Operations Dealer Control	12 67	0		0	0	0	3	0	<u> </u>	.2 .00				
		Collateral Recovery	47	0		0	14	0	33	C						
		CC Coll Recv	12	0		0	0	0	12	C						
		Non Collateral Deficiency Vendor Oversight	14 52	0		5	<u>0</u>	0	43	0						
		CC Vdr Oversight	6	0		0	2	0	4	0	1	6 Yes				
			266		•											
Dominique Doyenard	031	Dialer Administration	11	6	0	0	5	0	0	0	0	11 Yes				
		Business Process Optimization	6	0	C		0	0	6	C	C					
		Operational Analytics	13	0	C	0	6	0	1	6	0	13 Yes				
			30													
Linda Vrazel	031	Quality Assurance	52	0	C		0	0	0	1	51					
		CC Dealer Advocacy and Maintenance Credit Bureau Advocacy	18	0	C		10	0	0	0	18					
		Advocacy Analytics	1	0	C		0	0	1	C	o o					
		Customer Advocacy	21	0	C	0	0	0	21	C	C	21 Yes				
			110													
Graham Anderson	036	Titles	82	0	0	20	0	0	62	0	0	82 Yes				
		CC Titles	15	0	C	0	1	0	14	C	0	15 Yes				
	-	Insurance CC Insurance	49 18	0	0	0	0	0	49 18	0	0 0	49 Yes 18 Yes				
		Account Services Unit ASU	43	0		0	0	0	43	0						
		CC Account Services Unit	6	0		0	0	0	6	C	0	6 Yes				
	050	Impounds CC Impounds	41	0		0	0	0	41	0	9					
	1	CC Impounds	261			0		U	,			7 163				
2 11 21 1																
Scott Dieckman	047	Unsecured Credit Card	52 52	51	C	0	0	0	1	0)	52 Yes				
			0L													
James Hart	031	Quality Control	78	1	C		0	0	28	0						
		Strategic Operations	18 96	0	C	OJ OJ	1	0	2	0	15	18 Yes				
Mark Smith	034	Program Management	46	0			0		<u>17</u>	0						
	1	Program Management CCAR	47	0	[C	0	0	U	0		'	1 Yes				
Kim Thorndyke	046	Customer Service Customer Service Operations	170	0		2 0	43	0	85	0	0 0					
		OSP Vendor Management	5	0		0	1	0	<u> </u>	2	0					
		CC Customer Service Support	231	0	41	0	53	0	137	C	C	231 Yes				
			411													
Brent Huisman	050	Asset Remarketing	53	0	0	0	0	0	51	2	2 0	53 Yes				
		CC Asset Remarketing	78	0		10	13	0	40	C	12	78 Yes				
		Auctions CC Auctions	31	0		0	0	0	2	29	0	31 Yes 0 Yes				
	1	1	162			- 0		, J				1				
Brad Quick	000	Specialized Services	00				_	0	20		d -	63 Yes				
DIAG MICK	038 038	Specialized Services Cease and Desist	63	0	0	0	0		63	0						
	035	Bankruptcy	98	0	1	14	0	0	83	C	0	98 Yes				
		CC Bankruptcy	7 168	0	C	0	0	0	7	C	0	7 Yes				
												1				
Wayne Nightengale	049	Late Stage	752 77	0		29	308	0	306	0		752 Yes				
		Early Stage CC Late Stage	77 180	0		0	24	0	46	0						
		CC Early Stage	197	0			79	0	34	0						
		Collections Operations	4	0	1	0	1	0	2	O		4 Yes				
			1210									1				
Scott Rundle	056	RL Orig Operations	2	1	0		0		1	0		2 Yes				
		RL Sales	27	0	C	0	0	0	25	2	2 0	27 Yes				
			29									1				
Tony Kutiper	054	Funding Operations	5	2	C	0	0	0	0	0	3	5 Yes				
		Core Funding	59	26		0	33	0	0	0		59 Yes				
	-	Core Call Center CarMax	22 14	10	1	0	11	0	0	0		22 Yes 14 Yes				
		Funding Direct	11	10	C	0	1	0	0	0	5 0	11 Yes				
		Chrysler Subvention	0	0	C	0	0	0	0	C		0 Yes				
		Fifth Third Funding Support	16	13	C	0	0	0	0	0		0 Yes 16 Yes				
		CC Funding	118	81		0	37	0	0	0		118 Yes				
		CC Call Center	14	0	C	0	14	0	0	O	0	14 Yes				

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 317 of 377 PageID 1142

		NMAC	12	12	0	0	0	0	0	0	0	1
	048	Credit	94	0	0	0	0	0	0	4	90	
		Credit Operations	4	0	0	0	0	0	0	0	4	
			369									
ennifer Davis	040	Accounting	117	0	0	0	0	0	41	0	76	1
	•	-	117	•	·	·	·	•		•		
m Brewster	045	IT Service Support	59	3	5	0	6	1	31	0	13	
		IT Call Center Office	20	0	1	0	15	0	4	0	0	
		IT Client Services	14	0	0	0	8	0	5	0	1	
			93									
obin Page	055	Profitability Analytics	5	0	0	0	0	0	0	0	5	
		Data Reporting	17	0	0	0	2	0	10	2	3	
			22			·		•	•	•		
aymond Scott	024	Legal & Regulatory Profes	19	0	0	0	0	0	1	3	15	
•		Legal & Regulatory Suppor	37	0	0	0	0	0	1	1	35	
		Replevin	11	0	0	0	0	0	11	0	0	
			67					•				
		To	otal 3510		Grav	Total	0		т	HX Total	411	

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 318 of 377 PageID 1143

From: Nicole Heinicke <nheinicke@santanderconsumerusa.com>

To: Kristen Lagunes klagunes@santanderconsumerusa.com, Whitney Andres

<wandres@santanderconsumerusa.com>, Jeanette Rodriguez

<JRODRIGUEZ@santanderconsumerusa.com>, Reena Mathew

<rmathew@santanderconsumerusa.com>, Sabrina Boyd

<SBOYD@santanderconsumerusa.com>, Melissa Lawson

<MLAWSON@santanderconsumerusa.com>, Hortensia Perez

<hperez@santanderconsumerusa.com>

Cc: Angelina Hullum <AHULLUM@santanderconsumerusa.com>, Yessica Adriano

<YADRIANO@santanderconsumerusa.com>, Kayla Liggett

<a href="mailto: <a href="mailto: <a hr

<selad@santanderconsumerusa.com>, Edward Fabritiis

<efabritiis@santanderconsumerusa.com>

Subject: Headcount

Date: Mon, 21 Dec 2015 16:24:05 +0000

Importance: Normal

Attachments: Headcount_by_Department.xlsm

Hello!

We have updated the Headcount report for this week. Please let me know if you have any questions. It can be found in the headcount folder on the G Drive. (G:\HR Site Folders\NRH\Headcount)

Thanks! Nicole

Nicole Heinicke

Santander Consumer USA Inc. HR Generalist

PHONE 214.452.7016 MOBILE 214.212.8260

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 319 of 377 PageID 1144

								1 4:			Contrate Martin	Colored ODEN Dans Maline Maline
SVP	Cost Center	Departments	Headcount	Corporate	Arapahoe I	Arapahoe II	Lewisville	Location Mesa AZ	North Richland Hills Remote	Office Corporate THX	Subtotal Match	Sabrina OPEN Reena Melissa Whitney Kristen Tensya Jeanette 96 636 747 490 685 194 281 28
Mark Mooney	047	Reinstatements	45	0	2	8	3	0	32	0 0	45 Yes	
		CC Reinstatements	11	0	0	C	11	0	0	0 0	11 Yes	Combined 3157
		Recovery Operations Dealer Control	12 67	0			0	0	3	0 9		
		Collateral Recovery	47	0			14	0	33	0 0		
		CC Coll Recv	12	0	0	C	0	0	12	0 0		
		Non Collateral Deficiency	14	0		5	0	0	4	0 0		
		Vendor Oversight	52	0	0		4	0	42	0 6		
		CC Vdr Oversight	266	0	U	ı C		U	4	UJ C	o res	
			200									
Dominique Doyenard	031	Dialer Administration	11	6	0			0	0	0 0		
		Business Process Optimization	6	0	0		Ů	0	6	0 0		
		Operational Analytics	30	0	0	C	0	0	I	0	13 Yes	
			00									
Linda Vrazel	031	Quality Assurance	50	0	0		0	0	0	1 49		
		CC Dealer Advocacy and Maintenance	18	0	0		0	0	0	0 18	18 Yes	
		Credit Bureau Advocacy	18	0	0		9	0	0	0 9	.0 .00	
		Advocacy Analytics Customer Advocacy	21	0			0	0	21	0 0	21 Yes	
	1	Cactomor riavecacy	108	, o				v	2.1		21,100	
			,									
Graham Anderson	036	Titles	82	0		20	0	0	62	0 0		
	-	CC Titles Insurance	15 49	0	0		1	0	14 49	0 0	15 Yes 49 Yes	
		CC Insurance	18	0	0	0	0	0	18	0 0		
		Account Services Unit ASU	43	0		d	0	0	43	0 0		
		CC Account Services Unit	6	0	0	C	0	0	6	0 0	6 Yes	
	050	Impounds	39	0		C	0	0	39	0 0		
		CC Impounds	260	0	0		0	0	8	0 0	8 Yes	
			260									
Scott Dieckman	047	Unsecured Credit Card	52	51	0	0	0	0	1	0 0	52 Yes	
	•		52						•	•		
	201	0 11 0 1 1	70					٥	00	2	70 1/	
James Hart	031	Quality Control	79 18	1	0		0	0	29	0 48		
		Strategic Operations	97	U	0			U	T T	0 10	lo res	
Mark Smith	034	Program Management	46	0					17	0 29		
		Program Management CCAR	1	0	0	C	0	0	0	0 1	1 Yes	
			47									
Kim Thorndyke	046	Customer Service	169	0	42		42	0	85	0 0	169 Yes	
,		Customer Service Operations	5	0		C	0	0	5	0 0		
		OSP Vendor Management	5	0		C	1	0	1	2 0		
		CC Customer Service Support	228 407	0	40		54	0	134	0 0	228 Yes	
			407									
Brent Huisman	050	Asset Remarketing	56	0	0	(C	0	0	44	2 10	56 Yes	
		CC Asset Remarketing	77	0	1	12	13	0	38	0 13	77 Yes	
		Auctions	31	0	0	C	0	0	2	29 0		
		CC Auctions	164	0	0		0	0	0	0 0	0 Yes	
			164									
Brad Quick	038	Specialized Services	62	0	0	i c	0	0	62	0 0	62 Yes	
	038	Cease and Desist	0	0	0	C	0	0	0	0 0	0 Yes	
	035	Bankruptcy	98	0	1	14	0	0	83	0 0		
		CC Bankruptcy	167	0	0	C	0	0	7	0 0	7 Yes	
			107									
Wayne Nightengale	049	Late Stage	827	0	184	30	308	0	305	0 0	827 Yes	
		Early Stage	827 72	0		C	24	0	46	0 0	72 Yes	
		CC Late Stage	182	0			84	0	71	0 0		
		CC Early Stage	199	0	86	C	79	0	34	0 0		
	L	Collections Operations	1284	0	1		1	0	2	0 0	4 Yes	
			1204									
Scott Rundle	056	RL Orig Operations	2	1	0				1	0 0	2 Yes	
		RL Sales	27	0	0	C	0	0	25	2 0	27 Yes	
			29								1	
Tony Kutiper	054	Funding Operations	5	2			0	ا م	٥١	0 3	5 Yes	
Tony Number	0.04	Core Funding	59	26	0	C	33	0	0	0 0	59 Yes	
		Core Call Center	23	10	1	C		0	1	0 0	23 Yes	
		CarMax	14	14	0	C	0	0	0	0 0	14 Yes	
		Funding Direct	11	10		C	1	0	0	0 0	11 Yes	
		Chrysler Subvention Fifth Third	0	0	0	C	0	0	0	0 0	0 Yes 0 Yes	
<u> </u>	 	Funding Support	16	13	0	C		0	0	0 0	0 Yes 16 Yes	
		CC Funding	118	81	0	C	37	0	0	0 0	118 Yes	
		CC Call Center	14	0	0	C	14	0	0	0 0	14 Yes	

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 320 of 377 PageID 1145

		NMAC	12	12	0	0	0	0	0	0	0	1
	048	Credit	95	0	0	0	0	0	0	4	91	
		Credit Operations	4	0	0	0	0	0	0	0	4	
			371									
ennifer Davis	040	Accounting	117	0	0	0	0	0	40	0	77	1
			117	•					•	•		
m Brewster	045	IT Service Support	59	3	5	0	6	1	31	0	13	
	1	IT Call Center Office	20	0	1	0	15	0	4	0	0	
		IT Client Services	14	0	0	0	8	0	5	0	1	
		•	93									
obin Page	055	Profitability Analytics	4	0	0	0	0	0	0	0	4	
		Data Reporting	17	0	0	0	1	0	11	2	3	
			21	,		,			•			
aymond Scott	024	Legal & Regulatory Profes	19	0	0	0	0	0	1	3	15	
•		Legal & Regulatory Suppor	37	0	0	0	0	0	1	1	35	
		Replevin	11	0	0	0	0	0	11	0	0	
	'		67	'		'						
		Tot	tal 3580		Grav	Total	0		Т	HX Total	423	

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 321 of 377 PageID 1146

From: Nicole Heinicke <nheinicke@santanderconsumerusa.com>

To: Kristen Lagunes klagunes@santanderconsumerusa.com, Whitney Andres

<wandres@santanderconsumerusa.com>, Jeanette Rodriguez

<JRODRIGUEZ@santanderconsumerusa.com>, Reena Mathew

<rmathew@santanderconsumerusa.com>, Sabrina Boyd

<SBOYD@santanderconsumerusa.com>, Melissa Lawson

<MLAWSON@santanderconsumerusa.com>, Andrew Scordo

<ascordo@santanderconsumerusa.com>

Cc: Angelina Hullum <AHULLUM@santanderconsumerusa.com>, Yessica Adriano

<YADRIANO@santanderconsumerusa.com>, Kayla Liggett

<a href="mailto: <a href="mailto: <a hr

<selad@santanderconsumerusa.com>, Edward Fabritiis

<efabritiis@santanderconsumerusa.com>

Subject: Headcount

Date: Mon, 11 Jan 2016 16:55:50 +0000

Importance: Normal

Attachments: Headcount_by_Department.xlsm

Hello!

We have updated the Headcount report for this week. Please let me know if you have any questions. It can be found in the headcount folder on the G Drive. (G:\HR Site Folders\NRH\Headcount)

Thanks! Nicole

Nicole Heinicke

Santander Consumer USA Inc. HR Generalist

PHONE 214.452.7016
MOBILE 214.212.8260

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 322 of 377 PageID 1147

SVP	Cost Center	Departments	Headcount	Corporate Aran	ahoe I Arans	hoe II I ewi	Loca sville Mesa A	tion Z North Richland Hill:	Remote Office	Corporate THX	Subtotal Match	Sabrina OPEN Reena Melissa Whitney Kristen Jeanette AJ 93 607 904 10 673 197 26 524
Mark Mooney		Reinstatements	45	0	5	10 10 Ecwi	0		0 C	0	45 Yes	
•		CC Reinstatements	14	0	0	0	14	0	0 (0		Combined 3034
		Recovery Operations	13	0	0	0	0	0	4 (
		Dealer Control	67	0	0	0	0	0	0 0			
	-	Collateral Recovery CC Coll Recv	48 12	0	0	0	15	0	2 0		12 Yes	
		Non Collateral Deficiency	17	0	5	11	0		1 (
		Vendor Oversight	52	0	0	0	4	0	4 0			
		CC Vdr Oversight	5	0	0	0	2	0	3 (
			273			•						
Dominique Doyenard	031	Dialer Administration	11	6	٥١	0	5	0	ol c	0	11 Yes	
Dominique Doyenara		Business Process Optimization	6	0	0	0	0	0	6 0			
		Operational Analytics	13	0	0	0	6	0	1 6		13 Yes	
			30									
Linda Vrazel	031	Quality Assurance	50	0	٥١	0	0	0	1 1	48	50 Yes	
Ellida Videol	1	CC Dealer Advocacy and Maintenance	18	0	0	0	0	0	0 0	18		
		Credit Bureau Advocacy	21	0	0	0	10	0	0 0		21 Yes	
		Advocacy Analytics	1	0	0	0	0	0	1 (•	1 Yes	
		Customer Advocacy	21	0	0	0	0	0	1 (0	21 Yes	
			111									
Graham Anderson	036	Titles	79	0	0	20	0	0	9 (0	79 Yes	
		CC Titles	16	0	0	0	0		6 0	0	16 Yes	
		Insurance	50	0	0	0	0		0 (50 Yes	
	1	CC Insurance	18	0	0	0	0		8 (
	+	Account Services Unit ASU CC Account Services Unit	43	0	0	0	0		6 0			
	050	Impounds	6 43	0	0	0	0		3 (0 0		
		CC Impounds	8	0	0	0	0	0	8 0			
	•		263							•		
Scott Dieckman	047	Unsecured Credit Card	50	49	0	0	0	٥	1 (0	50 Yes	
Scott Dieckman	047	Orisecured Credit Card	50	49	U	U	U	U	1) U	50 res	
James Hart	031	Quality Control	80	1	0	1	0	0	8 (80 Yes	
		Strategic Operations	17 97	0	0	0	1	0	1 (15	17 Yes	
			97									
Mark Smith	034	Program Management	48	0	0	0	0	0	8 (30	48 Yes	
		Program Management CCAR	1	0	0	0	0	0	0 (1	1 Yes	
			49									
Kim Thorndyke	046	Customer Service	186	0	47	13	41	٥	5 (0	186 Yes	
rum morndyke	040	Customer Service Operations	4	0	0	0	0	0	4 (0		
		OSP Vendor Management	4	0	1	0	0	0	1 2	0	4 Yes	
		CC Customer Service Support	229	0	40	0	52	5 10	2 (0	229 Yes	
			423									
Brent Huisman	050	Asset Remarketing	59	0	Ol	0	0	0	1 2	2 46	59 Yes	
		CC Asset Remarketing	77	0	0	13	13	0	8 (13	77 Yes	
		Auctions	30	0	0	0	0	0	1 29	0	30 Yes	
		CC Auctions	0	0	0	0	0	0	0 0	0	0 Yes	
			166									
Brad Quick	038	Specialized Services	64	0	0	0	0	0	4 (0	64 Yes	
	038	Cease and Desist	0	0	0	0	0		0 0		0 Yes	
	035	Bankruptcy	100	0	1	14	0	0			100 Yes	
		CC Bankruptcy	171	0	0	0	0	0	7 (0	7 Yes	
			1/1									
Wayne Nightengale	049	Late Stage	825	0	170	54	303	0 29	8 (0	825 Yes	
,no reginorigato	1	Early Stage	825 71	0	2	0	23	0	6 0			
		CC Late Stage	185	0	32	0	83	0	0 (0	185 Yes	
		CC Early Stage	185	0	77	0	75	0	3 (0	185 Yes	
	1	Collections Operations	1270	0	1	0	1	U	2	0	4 Yes	
			12/0									
Scott Rundle	056	RL Orig Operations	2	1	0	0	0	0	1 (
		RL Sales	25	0	0	0	0	0	3 2	0		
			27									
Tony Kutiper	054	Funding Operations	0	2	οl	٥١	0	4	ol c	1 2	9 Yes	
Torry Number	004	Core Funding	55	25	0	0	30		0 0			
	1	Core Call Center	22	10	1	0	11		0 0			
		CarMax	16	16	0	0	0		0 0	0	16 Yes	
		Funding Direct	10	9	0	0	1		0 0	0	10 Yes	
		Chrysler Subvention	0	0	0	0	0		0 0		0 Yes	
	1	Fifth Third	0	0	0	0	0		0 0			
	1	Funding Support CC Funding	113	77	0	0	36		0 0	0 0	16 Yes 113 Yes	
		CC Call Center	14	0	0	0	14	0	0 0			

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 323 of 377 PageID 1148

		NMAC	12	12	0	0	0	0	0	0	0	12 Yes
	048	Credit	94	0	0	0	0	0	0	4	90	94 Yes
		Credit Operations	4	0	0	0	0	0	0	0	4	4 Yes
			365									
Jennifer Davis	040	Accounting	117	0	0	0	0	0	40	0	77	117 Yes
		-	117			•			•	•		
Jim Brewster	045	IT Service Support	59	3	5	0	6	1	31	0	13	59 Yes
		IT Call Center Office	20	0	1	0	15	0	4	0	0	20 Yes
		IT Client Services	13	0	0	0	8	0	5	0	0	13 Yes
			92						·	· ·		
Tobin Page	055	Profitability Analytics	3	0	0	0	0	0	0	0	3	3 Yes
TODITT ago	- 000	Data Reporting	18	0	0	0	1	0	11	2	4	18 Yes
	-		21	-								
Raymond Scott	024	Legal & Regulatory Profes	20	0	0	0	0	0	2	3	15	20 Yes
		Legal & Regulatory Suppor	37	0	0	0	0	0	1	1	35	37 Yes
		Replevin	12	0	0	0	0	0	12	0	0	12 Yes
		•	69					•				
			·		<u>"</u>		· · · · · · · · · · · · · · · · · · ·		•	•		
		Total	I 3594		G	ray Total	0			THX Total	560	

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 324 of 377 PageID 1149

From: Nicole Heinicke <nheinicke@santanderconsumerusa.com>

To: Kristen Lagunes klagunes@santanderconsumerusa.com, Whitney Andres

<wandres@santanderconsumerusa.com>, Jeanette Rodriguez

<JRODRIGUEZ@santanderconsumerusa.com>, Reena Mathew

<rmathew@santanderconsumerusa.com>, Sabrina Boyd

<SBOYD@santanderconsumerusa.com>, Melissa Lawson

<MLAWSON@santanderconsumerusa.com>, Andrew Scordo

<ascordo@santanderconsumerusa.com>

Cc: Angelina Hullum <AHULLUM@santanderconsumerusa.com>, Yessica Adriano

<YADRIANO@santanderconsumerusa.com>, Kayla Liggett

<a href="mailto: <a href="mailto: <a hr

<selad@santanderconsumerusa.com>, Edward Fabritiis

<efabritiis@santanderconsumerusa.com>

Subject: Headcount

Date: Mon, 18 Jan 2016 16:44:24 +0000

Importance: Normal

Attachments: Headcount by Department.xlsm

Happy Monday All!

We have updated the Headcount report for this week. Please let me know if you have any questions. It can be found in the headcount folder on the G Drive. (G:\HR Site Folders\NRH\Headcount)

Thanks! Nicole

Nicole Heinicke

Santander Consumer USA Inc.

HR Generalist

PHONE 214.452.7016 MOBILE 214.212.8260

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 325 of 377 PageID 1150

SVP	Cost Center	Departments	Headcount	Corporato Ara	nahaa I Ara	noboo II I o		ocation	orth Richland Hills Remote	Office Corporate THY	Subtotal Match	Sabrina OPEN Reena Melissa Whitney Kristen Jeanette AJ 94 604 884 60 669 196 26 519
Mark Mooney	047	Reinstatements	HeadCount 45	0 0	5	10	wisville ivies	0 N	30	0 (94 004 884 80 809 190 20 519
		CC Reinstatements	13	0	0	0	13	0	0	0		Combined 3052
		Recovery Operations Dealer Control	15 68	0	0	0	0	0	5	0 10		
		Collateral Recovery	49	0	0	0	16	0	33	0 0	49 Yes	
		CC Coll Recv	12 17	0	0	0	0	0	12	0 (
		Non Collateral Deficiency Vendor Oversight	17 52	0	5	11	4	0	44	0 0	17 Yes 52 Yes	
		CC Vdr Oversight	5	0	0	0	2	0	3	0 (
			276						•	•		
Dominique Doyenard	031	Dialer Administration	11	6	0	0	5	0	0	0	11 Yes	
		Business Process Optimization	6	0	0	0	0	0	6	0 (6 Yes	
		Operational Analytics	13 30	0	0	0	6	0	1	6	13 Yes	
Linda Vrazel	031	Quality Assurance	51	0	0	0	0	0	1	1 49		
		CC Dealer Advocacy and Maintenance Credit Bureau Advocacy	18	0	0	0	10	0	0	0 18		
		Advocacy Analytics	22	0	0	0	0	0	1	0	1 Yes	
		Customer Advocacy	21 113	0	0	0	0	0	21	0	21 Yes	
			113									
Graham Anderson	036	Titles	79	0	0	20	0	0	59	0		
	-	CC Titles Insurance	16 49	0	0	0	0	0	16 49	0 0	16 Yes 49 Yes	
		CC Insurance	19	0	0	0	0	0	19	0 0		
		Account Services Unit ASU	43	0	0	0	0	0	43	0 (43 Yes	
	050	CC Account Services Unit Impounds	6 44	0	0	0	0	0	6 44	0 0	6 Yes 44 Yes	
	030	CC Impounds	8	0	0	0	0	0	8	0 0	8 Yes	
			264	•						·		
Scott Dieckman	047	Unsecured Credit Card	49	49	0	0	0	0	0	0	49 Yes	
Ook Biodinan		Onescared Great Gard	49	2	۰	0			٧	٠	10 100	
James Hart	031	Quality Control	81	1	٥	1	0	٥	20	0 5	81 Yes	
James Hart		Quality Control Strategic Operations	17	0	0	0	1	0	28	0 5		
	1		98									
Mark Smith	034	Program Management	48	0	٥	0	0	0	19	0 29	48 Yes	
Wark Office	004	Program Management CCAR	1	0	0	0	0	0	0	0		
			49									
Kim Thorndyke	046	Customer Service	185	0	47	12	41	0	85	0	185 Yes	
,		Customer Service Operations	4	0	0	0	0	0	4	0 (4 Yes	
		OSP Vendor Management CC Customer Service Support	248	0	38	0	53	28	120	2 0	4 Yes 248 Yes	
		CC Customer Service Support	441	U U	30	U	33	20	123	0	240 163	
Brent Huisman	050	Asset Remarketing	50	0	٥١	0	0	٥	7	2 50	59 Yes	
Brent Huisman	050	CC Asset Remarketing	59 75	0	0	13	11	0	38	0 13		
		Auctions	29	0	0	0	0	0	0	29	29 Yes	
		CC Auctions	163	0	0	0	0	0	0	0 (0 Yes	
			103									
Brad Quick	038	Specialized Services	64	0	0	0	0	0	64	0 0	64 Yes	
		Cease and Desist Bankruptcy	100	0	0	0 14	0	0	85	0 0		
	000	CC Bankruptcy	7	0	0	0	0	0	7	0 0		
			171									
Wayne Nightengale	049	Late Stage	822	0	170	53	302	0	297	0	822 Yes	
		Early Stage	822 71	0	2	0	23	0	46	0 (71 Yes	
		CC Late Stage CC Early Stage	185 182	0	32 76	0	83	0	70	0 0	185 Yes 182 Yes	
		Collections Operations	4	0	1	0	1	0	2	0 0		
			1264									
Scott Rundle	056	RL Orig Operations	2	1	0	0	0	0	1	0	2 Yes	
_ Jott I turially		RL Sales	25	0	0	0	0	0	23	2		
			27			-						
Tony Kutiper	054	Funding Operations	35	2	0	0	0	30	0	0 3	35 Yes	
		Core Funding	55	25	0	0	30	0	0	0	55 Yes	
		Core Call Center CarMax	22 14	10	0	0	11	0	0	0 0		
		Funding Direct	14	9	0	0	1	0	0	0 0		
		Chrysler Subvention	0	0	0	0	0	0	0	0 (0 Yes	
		Fifth Third Funding Support	16	0	0	0	0	0	0	0 0		
		CC Funding	99	75	0	0	24	0	0	0 (99 Yes	
		CC Call Center	14	0	0	0	14	0	0	0 (14 Yes	

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 326 of 377 PageID 1151

			Total 3617			Gray Total	0			THX Total	565	
			69									
		Replevin	12	0	0	0	0	0	12	0	0	12 Ye
•		Legal & Regulatory Suppor	37			0	0	0	1	1	35	37 Ye
aymond Scott	024	Legal & Regulatory Profes	20	0	0	0	0	0	2	3	15	20 Ye
			21									
		Data Reporting	18		0	0	1	0	11	1	5	18 Ye
obin Page	055	Profitability Analytics	3			0		0	0	0	3	3 Ye
	•	•	94		•							
		IT Client Services	14	0	0	0	8	0	5	0	1	14 Ye
		IT Call Center Office	20	0	1	0	15	0	4	0	0	20 Ye
m Brewster	045	IT Service Support	60	3	5	0	6	2	31	0	13	60 Ye
			113									
cilillei Davis	040	Accounting	115		0	U	U	U	40	U	73	113 16
ennifer Davis	040	Accounting	115	0	0	0	٥	0	40	0	75	115 Ye
			373									
		Credit Operations	4	0	0	0	0	0	0	0	4	4 Ye
	048	Credit	91	0	0	0	0	0	0	4	87	91 Ye
		NMAC	13	13	U	0	U	0	0	U		13 Ye

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 327 of 377 PageID 1152

From: Nicole Heinicke <nheinicke@santanderconsumerusa.com>

To: Kristen Lagunes klagunes@santanderconsumerusa.com, Whitney Andres

<wandres@santanderconsumerusa.com>, Jeanette Rodriguez

<JRODRIGUEZ@santanderconsumerusa.com>, Reena Mathew

<rmathew@santanderconsumerusa.com>, Sabrina Boyd

<SBOYD@santanderconsumerusa.com>, Melissa Lawson

<MLAWSON@santanderconsumerusa.com>, Andrew Scordo

<ascordo@santanderconsumerusa.com>

Cc: Angelina Hullum <AHULLUM@santanderconsumerusa.com>, Yessica Adriano

<YADRIANO@santanderconsumerusa.com>, Kayla Liggett

<a href="mailto:kliggett@santanderconsumerusa.com>, Stephanie Elad

<selad@santanderconsumerusa.com>, Edward Fabritiis

<efabritiis@santanderconsumerusa.com>

Subject: Headcount

Date: Mon, 25 Jan 2016 16:21:24 +0000

Importance: Normal

Attachments: Headcount by Department.xlsm

Hello!

We have updated the Headcount report for this week. Please let me know if you have any questions. It can be found in the headcount folder on the G Drive. (G:\HR Site Folders\NRH\Headcount)

Thanks! Nicole

Nicole Heinicke

Santander Consumer USA Inc. HR Generalist

PHONE 214.452.7016 MOBILE 214.212.8260

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 328 of 377 PageID 1153

SVP/EVP	Cost Center	Departments	Headcount	Corporate Ara	nahne I Arans	hne II I ewie	Loca ville Mesa A	tion Z North Richland Hills Re	mote Office Cornorate TH	Subtotal Match	Sabrina OPEN Reena Melissa Whitney Kristen Jeanette AJ 94 608 660 58 666 415 26 511
Mark Mooney		Reinstatements	45	0	5	10 Lewis	0 Nesa Az	0 30	0	0 45 Yes	94 000 000 30 000 413 20 311
mark mooney	1	CC Reinstatements	13	0	0	0	13	0 0	0	0 13 Yes	Combined 3038
		Recovery Operations	15	0	0	0	0	0 6	0	9 15 Yes	
		Dealer Control	67	0	0	0	0	0		67 Yes	
		Collateral Recovery	49	0	0	0	16	0 33	0	0 49 Yes	
		CC Coll Recv Non Collateral Deficiency	12 16	0	5	10	0	0 12	0	0 12 Yes 0 16 Yes	
		Vendor Oversight	53	0	0	0	4	0 45	0	4 53 Yes	
		CC Vdr Oversight	5	0	0	0	2	0 3	0	0 5 Yes	
	•		275	•	'		•				
Daminimus Damasad	024	Dialer Administration	11	C	0	0	-	0	0	0 11 Yes	
Dominique Doyenard	031	Business Process Optimization	6	6	0	0	0	0 0	0	0 11 Yes 0 6 Yes	
		Operational Analytics	13	0	0	0	6	0 1	6	0 13 Yes	
	1	1	30					-			
Linda Vrazel	031	Quality Assurance	51	0	0	0	0	0 1		49 51 Yes	
		CC Dealer Advocacy and Maintenance Credit Bureau Advocacy	18 23	0	0	0	10	0 0	0	18 18 Yes 13 23 Yes	
	+	Advocacy Analytics	1	0	0	0	0	0 1	0	0 1 Yes	
		Customer Advocacy	21	0	0	0	0	0 21	0	0 21 Yes	
	'	,	114								
						00				0 65 11	
Graham Anderson	036	Titles	80 16	0	0	20	0	0 60 16	0	0 80 Yes	
	1	CC Titles Insurance	16	0	0	0	0	0 16 49	0	0 16 Yes 0 49 Yes	
	1	CC Insurance	19	0	0	0	0	0 19		0 49 Yes	
		Account Services Unit ASU	43	0	0	0	0	0 43	0	0 43 Yes	
		CC Account Services Unit	6 44	0	0	0	0	0 6	0	0 6 Yes	
		Impounds	44	0	0	0	0	0 44	0	0 44 Yes	
		CC Impounds	8	0	0	0	0	0 8	0	0 8 Yes	
			265								
Scott Dieckman	047	Unsecured Credit Card	49	49	0	0	0	0	0	0 49 Yes	
			49								
Mark Smith	031	Quality Control	81	1	0	0	0	0 28	0	81 Yes	
	034	Strategic Operations Program Management	17 48	0	0	0	0	0 19	0	15 17 Yes 29 48 Yes	
		Program Management CCAR	1	0	0	0	0	0 0	0	1 1 Yes	
	1	i rogram managomoni cor a c	147			<u> </u>		o o	•		
Troy Miller	046	Customer Service	183	0	46	12	41	0 84	0	0 183 Yes	
	-	OSP Vendor Management	4	0	0	0	0	0 4	0	0 4 Yes 0 4 Yes	
	1	CC Customer Service Support	246	0	38	0		7 128	0	0 246 Yes	
			437								
Brent Huisman	050	Asset Remarketing	59 75 32	0	0	13	0	0 7	2	50 59 Yes	
		CC Asset Remarketing Auctions	75	0	0	0	0	0 38	32	75 Yes 0 32 Yes	
		CC Auctions	0	0	0	0	0	0 0	0	0 0 Yes	
			166					-			
Brad Quick		Specialized Services	62	0	0	0	0	0 62	0	0 62 Yes	
	038	Cease and Desist	100	0	1	14	0	0 0 85	0	0 0 Yes	
	035	Bankruptcy CC Bankruptcy	100	0	0	0	0	0 7	0	0 100 Yes 0 7 Yes	
	1	1	169	· ·		~		1		7 103	
Wayne Nightengale	049	Late Stage	819	0	169	53	302	0 295	0	0 819 Yes	
	1	Early Stage	71	0	2	0	23	0 46	0	0 71 Yes 0 185 Yes	
	1	CC Late Stage CC Early Stage	185 176	0	32 71	0	71	0 70	0	0 185 Yes 0 176 Yes	
	1	Collections Operations	4	0	1	0	1	0 2	0	0 176 Tes 0 4 Yes	
	<u> </u>		1255								
Tony Kutiper	056	RL Orig Operations	2	1	0	0	0	0 1 23	0	0 2 Yes	
	054	RL Sales Funding Operations	25 34	2	0	0	0 2	9 0	0	0 25 Yes 3 34 Yes	
	0.04	Core Funding	54	24	0	0	30	0 0	0	0 54 Yes	
		Core Call Center	54 22	10	1	0	11	0 0	0	0 22 Yes	
		CarMax	14	14	0	0	0	0	0	0 14 Yes	
		Funding Direct	9	9	0	0	0	0 0	0	0 9 Yes	
	1	Chrysler Subvention	0	0	0	0	0	0 0	0	0 Yes	
	1	Fifth Third Funding Support	17	14	0	0	3	0 0	0	0 0 Yes 0 17 Yes	
	+	CC Funding	98	74	0	0	24	0 0	0	0 98 Yes	
		CC Call Center	14	0	0	0	14	0 0	0	0 14 Yes	
		NMAC	13 90	13	0	0	0	0	0	0 13 Yes	
		Credit	90	0	0	0	0	0 0	4	36 90 Yes	
İ	1	Credit Operations	4	0	0	0	0	0	0	4 4 Yes	
	•		396	-							

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 329 of 377 PageID 1154

Jennifer Davis	040	Accounting	121	0	0	0	0	0	41	0	80	121 Yes
			121									
lim Brewster	045	IT Service Support	59	3	5	0	6	2	30	0	13	59 Yes
		IT Call Center Office	20	0	1	0	15	0	4	0	0	20 Yes
		IT Client Services	14	0	0	0	8	0	5	0	1	14 Yes
			93									
obin Page	055	Profitability Analytics	3	0	0	0	0	0	0	0	3	3 Yes
		Data Reporting	18	0	0	0	1	0	11	1	5	18 Yes
		•	21									
Raymond Scott	024	Legal & Regulatory Profes	19	0	0	0	0	0	1	3	15	19 Yes
		Legal & Regulatory Suppor	37	0	0	0	0	0	1	1	35	37 Yes
		Replevin	12	0	0	0	0	0	12	0	0	12 Yes
		•	68					•	•	•		
			·		·	·						
		Tota	I 3606		G	ray Total	0		TH	X Total	568	

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 330 of 377 PageID 1155

From: Nicole Heinicke <nheinicke@santanderconsumerusa.com>

To: Kristen Lagunes klagunes@santanderconsumerusa.com, Whitney Andres

<wandres@santanderconsumerusa.com>, Jeanette Rodriguez

<JRODRIGUEZ@santanderconsumerusa.com>, Reena Mathew

<rmathew@santanderconsumerusa.com>, Sabrina Boyd

<SBOYD@santanderconsumerusa.com>, Melissa Lawson

<MLAWSON@santanderconsumerusa.com>, Andrew Scordo

<ascordo@santanderconsumerusa.com>

Cc: Angelina Hullum <AHULLUM@santanderconsumerusa.com>, Yessica Adriano

<YADRIANO@santanderconsumerusa.com>, Kayla Liggett

<a href="mailto:kliggett@santanderconsumerusa.com>, Stephanie Elad

<selad@santanderconsumerusa.com>, Edward Fabritiis

<efabritiis@santanderconsumerusa.com>

Subject: Headcount

Date: Mon, 01 Feb 2016 18:58:53 +0000

Importance: Normal

Attachments: Headcount_by_Department.xlsm

Hello!

We have updated the Headcount report for this week. Please let me know if you have any questions. It can be found in the headcount folder on the G Drive. (G:\HR Site Folders\NRH\Headcount)

Thanks! Nicole

Nicole Heinicke

Santander Consumer USA Inc.

HR Generalist

PHONE 214.452.7016 MOBILE 214.212.8260

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 331 of 377 PageID 1156

SVD/EV/D	Cost Center	Departments	Headcount	Corporate A	nahoo! A	nahoe II I -		Location	th Dichland Lilla Dom	oto Office Come	Subtotal Match	Sabrina OPEN Reena Melissa Whitney Kristen Jeanette AJ 96 613 657 58 694 415 28 507
SVP/EVP Mark Mooney		Reinstatements	Headcount 45	Corporate Ara	apanoe i Ara	apanoe II Le	ewisville ivie	sa AZ NOI	rth Richland Hills Rem	0 Corporate	0 45 Yes	96 613 657 58 694 415 28 507
		CC Reinstatements	13	0	0	0	13	0	0	0	0 13 Yes	Combined 3068
		Recovery Operations	16	0	0	0	0	1	6	0	9 16 Yes	
		Dealer Control Collateral Recovery	67 49	0	0	0	16	0	33	0	67 67 Yes 0 49 Yes	
		CC Coll Recv	12	0	0	0	0	0	12	0	0 12 Yes	
		Non Collateral Deficiency	14	0	5	9	0	0	0	0	0 14 Yes	
		Vendor Oversight	54	0	0	0	4	0	46	0	4 54 Yes 0 5 Yes	
	1	CC Vdr Oversight	275	U _I	U U	U	- 4	U U	٠ <u>٠</u>	O ₁	0 3 163	
Dominique Doyenard	031	Dialer Administration Business Process Optimization	11	6	0	0	0	0	0	0	0 11 Yes 0 6 Yes	
		Operational Analytics	13	Ö	0	0	6	0	1	6	0 13 Yes	
	•		30	•	·	·	,			•		
Linda Vrazel	031	Quality Assurance	51	٥١	٥١	0	0	0	1	1	49 51 Yes	
Ellida Videoi	1	CC Dealer Advocacy and Maintenance	18	0	0	0	0	0	0	0	18 18 Yes	
		Credit Bureau Advocacy	23	0	0	0	11	0	0	0	12 23 Yes	
		Advocacy Analytics Customer Advocacy	21	0	0	0	0	0	21	0	0 1 Yes 0 21 Yes	
		Customer Advocacy	114	υĮ	U]	U	U	U	21	U U	0 21 165	
Graham Anderson	036	Titles CC Titles	81 16	0	0	20	0	0	61	0	0 81 Yes 0 16 Yes	
		Insurance	49	0	0	0	0	0	49	0	0 16 Yes 0 49 Yes	
		CC Insurance	19	0	0	0	0	0	19	0	0 19 Yes	
		Account Services Unit ASU	43	0	0	0	0	0	43	0	0 43 Yes	
	050	CC Account Services Unit Impounds	6 46	0	0	0	0	0	6	0	0 6 Yes 0 46 Yes	
	030	CC Impounds	8	0	0	0	0	0	8	0	0 8 Yes	
			268	•					•	•		
Scott Dieckman	047	Unsecured Credit Card	49	49	0	0	0	٥	0	0	0 49 Yes	
Ocott Diconnan	047	Orisecured Orean Card	49	40	0	U		U		٧	0 45 105	
Mark Smith	031	Quality Control	81 17	1	0	1	0	0	28	0	51 81 Yes 16 17 Yes	
	034	Strategic Operations Program Management	49	0	0	0	0	0	20	0	29 49 Yes	
		Program Management CCAR	1	0	0	0	0	0	0	0	1 1 Yes	
			148									
Troy Miller	046	Customer Service	186	0	46	10	42	0	88	0	0 186 Yes	
,		Customer Service Operations	4	0	0	0	0	0	4	0	0 4 Yes	
		OSP Vendor Management	4	0	1	0	0	0	1	2	0 4 Yes	
		CC Customer Service Support	249 443	0	41	0	54	26	128	0	0 249 Yes	
Brent Huisman	050	Asset Remarketing	58	0	0	13	0	0	7	2	49 58 Yes	
		CC Asset Remarketing Auctions	75 33	0	0	13	10	0	39	33	13 75 Yes 0 33 Yes	
		CC Auctions	0	0	0	0	0	0	0	0	0 0 Yes	
			166									
Brad Quick	038	Specialized Services	62	0	٥١	0	0	٥	62	0	0 62 Yes	
	038	Cease and Desist	0	0	0	0	0	0	0	0	0 02 1es 0 Yes	
	035	Bankruptcy	100	0	1	14	0	0	85	0	0 100 Yes	
		CC Bankruptcy	7 169	0	0	0	0	0	7	0	0 7 Yes	
			109									
Wayne Nightengale	049	Late Stage	831	0	168	52	302	0	309	0	0 831 Yes	
		Early Stage	81	0	32	0	23	0	56	0	0 81 Yes 0 185 Yes	
		CC Late Stage CC Early Stage	185 172	0	69	0	69	0	34	0	0 185 Yes 0 172 Yes	
		Collections Operations	4	0	1	0	1	0	2	0	0 4 Yes	
			1273									
Tony Kutiper	056	RL Orig Operations	2	1	0	0	0	0	1	0	0 2 Yes	
		RL Sales	27 34	0	0	0	0	0	25	2	0 27 Yes	
	054	Funding Operations	34	2	0	0	0	29	0	0	3 34 Yes	
		Core Funding Core Call Center	54 22 14	24 10	1	0	11	0	0	0	0 54 Yes 0 22 Yes	
		CarMax	14	14	0	0	0	0	0	0	0 14 Yes	
		Funding Direct	9	9	0	0	0	0	0	0	0 9 Yes	
		Chrysler Subvention Fifth Third	0	0	0	0	0	0	0	0	0 0 Yes 0 Yes	
		Funding Support	17	14	0	0	3	0	0	0	0 0 Yes 0 17 Yes	
		CC Funding	97	74	0	0	23	0	0	0	0 97 Yes	
		CC Call Center	14 13	0	0	0	14	0	0	0	0 14 Yes	
ļ	048	NMAC Credit	90	13	0	0	0	0	0	0	0 13 Yes 86 90 Yes	
						- v					55 103	
		Credit Operations	397	0	0	0	0	0	0	0	4 Yes	

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 332 of 377 PageID 1157

	-	- 	68									
		Replevin	12	0	0	0	0	0	12	0	0	12 Yes
		Legal & Regulatory Suppor	37	0	0	0	0	0	1	1	35	37 Yes
Raymond Scott	024	Legal & Regulatory Profes	19	0	0	0	0	0	1	3	15	19 Yes
			24									
		Data Reporting	19	0	0	U	1	U	11	1	ь	19 Yes
obin Page	055	Profitability Analytics	5	0	0	0	0	0	0	0	5	5 Yes
	_	•	93									
		IT Client Services	14	0	0	0	8	0	5	0	1	14 Yes
III DIONOISI	- 0.0	IT Call Center Office	20	0	1	0	15	0	4	0	0	20 Yes
im Brewster	045	IT Service Support	59	3	5	0	6	2	30	01	13	59 Yes
			121									
ennifer Davis	040	Accounting	121	0	0	0	0	0	41	0	80	121 Yes

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 333 of 377 PageID 1158

From: Nicole Heinicke <nheinicke@santanderconsumerusa.com>

To: Kristen Lagunes klagunes@santanderconsumerusa.com, Whitney Andres

<wandres@santanderconsumerusa.com>, Jeanette Rodriguez

<JRODRIGUEZ@santanderconsumerusa.com>, Reena Mathew

<rmathew@santanderconsumerusa.com>, Sabrina Boyd

<SBOYD@santanderconsumerusa.com>, Melissa Lawson

<MLAWSON@santanderconsumerusa.com>, Andrew Scordo

<ascordo@santanderconsumerusa.com>

Cc: Angelina Hullum <AHULLUM@santanderconsumerusa.com>, Yessica Adriano

<YADRIANO@santanderconsumerusa.com>, Kayla Liggett

<a href="mailto: , Stephanie Elad

<selad@santanderconsumerusa.com>, Edward Fabritiis

<efabritiis@santanderconsumerusa.com>

Subject: Headcount

Date: Mon, 08 Feb 2016 17:36:23 +0000

Importance: Normal

Attachments: Headcount_by_ Department.xlsm

Hello!

We have updated the Headcount report for this week. Please let me know if you have any questions. It can be found in the headcount folder on the G Drive. (G:\HR Site Folders\NRH\Headcount)

Thanks! Nicole

Nicole Heinicke

Santander Consumer USA Inc. HR Generalist

THE Generalist

PHONE 214.452.7016 MOBILE 214.212.8260

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 334 of 377 PageID 1159

				_						
SVP/EVP	Cost Center	Departments	Headcount	Cornorate Are	anahoe I Aranak	ne II I awisvill	Location Mesa A7	on North Richland Hills Remote Office	ce Cornorate THY	Subtotal Match Sabrina OPEN Reena Melissa Whitney Kristen Jeanette AJ 96 614 656 59 703 414 28 505
Mark Mooney	047	Reinstatements	HeadCount 45	Corporate Ara	5 Arapar	10	n Nesa AZ		0 0	
	1	CC Reinstatements	13	0	0	0 1	3 0		0 0	
		Recovery Operations	16	0	0	0	0 1		0 9	9 16 Yes
		Dealer Control	68	0	0	0	0 0		0 68	
		Collateral Recovery	49 12	0	0	0 1	6 0		0 0	
	-	CC Coll Recv Non Collateral Deficiency	14	0	5	9	0 0		0 0	14 Yes
		Vendor Oversight	55	0	0	1	4 0		0 4	
		CC Vdr Oversight	5	0	0	0	2 0	3	0 0	5 Yes
			277							
Dominique Doyenard	031	Dialer Administration	11	6	0	0	5 0	0	0 0	11 Yes
Bonningao Boyonara		Business Process Optimization	6	0	0	0	0 0		0 0	
		Operational Analytics	13	0	0	0	5 0	1	7 0	
			30							
Linda Vrazel	031	Quality Assurance	51	0	0	0	0 0	1	1 49	51 Yes
		CC Dealer Advocacy and Maintenance	18	0	0	0	0 0	0	0 18	
		Credit Bureau Advocacy	23	0	0	0 1	1 0	0	0 12	2 23 Yes
		Advocacy Analytics	1	0	0	0	0 0	1	0 0	
		Customer Advocacy	21 114	0	0	0	0 0	21	0 0	0 21 Yes
Graham Anderson	036	Titles	82	0	0	20	0 0		0 0	
		CC Titles	17	0	0	0	0 0		0 0	17 Yes
	-	Insurance	48	0	0	0	0 0		0 0	0 48 Yes
	+	CC Insurance Account Services Unit ASU	19 43	0	0	0	0 0		0 0	
		CC Account Services Unit	6	0	0	0	0 0		0 0	
	050	Impounds	46	0	0	0	0 0		0 0	46 Yes
		CC Impounds	8	0	0	0	0 0		0 0	
			269							
Scott Dieckman	047	Unsecured Credit Card	47	47	0	0	0 0	0	0 0	0 47 Yes
	<u>'</u>		47							
Marila Carrilla	024	Overlite Overton	00	4	0	4		20	0 54	00 V
Mark Smith	031	Quality Control Strategic Operations	82 17	0	0	0	1 0		0 51	
	034	Program Management	49	0	0	0	0 0		0 29	
		Program Management CCAR	1	0	0	0	0 0		0 1	
			149							
Troy Miller	046	Customer Service	186	0	43	8 4	2 0	93	0 0	186 Yes
Troy Willion	1 0.0	Customer Service Operations	4	0	0	0	0 0	4	0 0	
		OSP Vendor Management	3	0	0	0	0 0	1	2 0	3 Yes
		CC Customer Service Support	248 441	0	40	0 5	4 26	128	0 0	248 Yes
			441							
Brent Huisman	050	Asset Remarketing	63	0	0	5	0 1	6	2 49	9 63 Yes
		CC Asset Remarketing	76	0	0	13 1	0 0	40	0 13	
		Auctions	33	0	0	0	0 0	-	0 0	
	1	CC Auctions	172	U	υĮ	U	UJ U	oj oj	0	0 Yes
Brad Quick	038	Specialized Services	61	0	0	0	0 0		0 0	
	038	Cease and Desist Bankruptcy	108	0	0	21	0 0		0 0	0 Yes 108 Yes
	033	CC Bankruptcy	7	0	0	0	0 0		0 0	7 Yes
			176							
Wayne Nightengele	049	Late Stage	0.45		174	53 30	1 .	247	0 0	845 Yes
Wayne Nightengale	049	Late Stage Early Stage	845 82	0	2	0 2	5 0	55	0 0	
		CC Late Stage	180	0	32		1 0		0 0	0 180 Yes
		CC Early Stage	180 157	0	54		9 0	34	0 0	157 Yes
		Collections Operations	4	0	1	0	1 0		0 0	
			1268					·		
Tony Kutiper	056	RL Orig Operations	2	1	0	0	0 0		0 0	2 Yes
		RL Sales	27	0	0	0	0 0	25	2 0	27 Yes
	054	Funding Operations	33	2	0	0	0 28		0 3	
	-	Core Funding Core Call Center	54 22 14	24 10	0	0 3	1 0		0 0	
	1	Core Call Center CarMax	14	14	0	0	0 0		0 0	
		Funding Direct	9	9	0	0	0 0		0 0	
		Chrysler Subvention	0	0	0	0	0 0	0	0 0	0 Yes
		Fifth Third	0	0	0	0	0 0		0 0	
		Funding Support	17	14	0	0	3 0		0 0	17 Yes
	1	CC Funding	97	73	0	0 2	4		0 0	
			1/				41 0			
		CC Call Center NMAC	14	13	0	0	0 0			14 Yes 13 Yes
	048	NMAC Credit	13 91	13 0	0	U	4 0 0 0 0 0	0 0	0 0 4 87	13 Yes 7 91 Yes
	048	NMAC	13	13	0	U	0 0 0 0 0 0	0 0	0 0	13 Yes 7 91 Yes

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 335 of 377 PageID 1160

Jennifer Davis	040	Accounting		126	0	0	0	U	0	41	U	85	126 Yes
				120									
Jim Brewster	045	IT Service Support		59	3	5	0	6	3	29	0	13	59 Yes
		IT Call Center Office		20	0	1	0	15	0	4	0	0	20 Yes
		IT Client Services		14	0	0	0	8	0	5	0	1	14 Yes
				93									
Tobin Page	055	Profitability Analytics		5	0	0	0	0	0	0	0	5	5 Yes
		Data Reporting		18	0	0	0	1	0	11	1	5	18 Yes
				23									
10 "	004	1 100 11 0 1		18		0	0	0	0	4	2	44	40 V
Raymond Scott	024	Legal & Regulatory Profes			0	U	U	U	U	- 1	3	14	18 Yes
		Legal & Regulatory Suppor		37	0	0	0	0	0	1	1	35	37 Yes
		Replevin		13	0	0	0	0	0	13	0	0	13 Yes
				68									
			Total 36	550		Gray 1	otal	0			THX Total	575	

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 336 of 377 PageID 1161

From: Nicole Heinicke <nheinicke@santanderconsumerusa.com>

To: Kristen Lagunes klagunes@santanderconsumerusa.com, Whitney Andres

<wandres@santanderconsumerusa.com>, Jeanette Rodriguez

<JRODRIGUEZ@santanderconsumerusa.com>, Reena Mathew

<rmathew@santanderconsumerusa.com>, Sabrina Boyd

<SBOYD@santanderconsumerusa.com>, Melissa Lawson

<MLAWSON@santanderconsumerusa.com>, Andrew Scordo

<ascordo@santanderconsumerusa.com>

Cc: Angelina Hullum <AHULLUM@santanderconsumerusa.com>, Yessica Adriano

<YADRIANO@santanderconsumerusa.com>, Kayla Liggett

<a href="mailto:<a href="mailto:kliggett@santandercon

<selad@santanderconsumerusa.com>, Edward Fabritiis

<efabritiis@santanderconsumerusa.com>

Subject: Headcount

Date: Mon, 15 Feb 2016 19:41:33 +0000

Importance: Normal

Attachments: Headcount_by_ Department.xlsm

Hello!

We have updated the Headcount report for this week. Please let me know if you have any questions. It can be found in the headcount folder on the G Drive. (G:\HR Site Folders\NRH\Headcount)

Thanks! Nicole

Nicole Heinicke

Santander Consumer USA Inc.

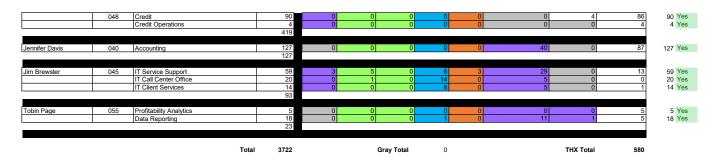
HR Generalist

PHONE 214.452.7016 MOBILE 214.212.8260

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 337 of 377 PageID 1162

SVP/EVP	Cost Center	Departments	Headcount	Corporate Ara	nahoe I Arai	nahoe II I ev	visvilla Ma	Location	North Richland Hills Remote Office	Corporate THY	Subtotal Match Sabrina OPEN Reena Melissa Whitney Kristen Jeanette AJ 96 612 653 106 699 412 28 536
Mark Mooney	047	Reinstatements	45	0	5	10	0	0	30 0	0 Ociporate Trix	
		CC Reinstatements	13	0	0	0	13	0	0 0	0	
		Recovery Operations	16	0	0	0	0	1	5 0	10	
		Dealer Control	68	0	0	0	0	0	0 0	68	8 Yes
		Collateral Recovery CC Coll Recv	49 12	0	0	0	16	0	33 0 12 0	0	9 Yes 12 Yes
		Non Collateral Deficiency	14	0	5	9	0	0	0 0	0	
		Vendor Oversight	55	0	ő	1	4	0	46 0	4	
		CC Vdr Oversight	6	0	0	0	3	0	3 0	0	
			278								
Dominique Doyenard	031	Dialer Administration	11	6	0	0	5	0	0 0	0	11 Yes
Bonninguo Boyonara	- 551	Business Process Optimization	6	0	0	0	0	0	6 0	0	
		Operational Analytics	12	0	0	0	4	0	1 7	0	12 Yes
			29								
Patrick Connor	031	Quality Assurance	51	0	0	0	0	0	0 1	50	51 Yes
		CC Dealer Advocacy and Maintenance	19	0	0	0	0	0	0 0	19	19 Yes
		Credit Bureau Advocacy	23	0	0	0	11	0	0 0	12	23 Yes
		Advocacy Analytics	1	0	0	0	0	0	1 0	0	1 Yes
	024	Customer Advocacy	21 18	0	0	0	0	0	21 0	0 14	21 Yes 18 Yes
	024	Legal & Regulatory Profes Legal & Regulatory Suppor	36	0	0	0	0	0	1 3	34	
		Replevin	13	0	0	0	0	0	13 0	0	13 Yes
			182	Ŭ					751		
Cook on An	000					00			COL		00 1/
Graham Anderson	036	Titles CC Titles	82 18	0	0	20	0	0	62 0 18 0	0	
	1	Insurance	48	0	0	0	0	0	48 0	0	
		CC Insurance	48 19	0	0	0	0	0	19 0	0	19 Yes
		Account Services Unit ASU	43	0	0	0	0	0	43 0	0	
		CC Account Services Unit	6	0	0	0	0	0	6 0	0	6 Yes
	050	Impounds	46	0	0	0	0	0	46 0	0	
		CC Impounds	270	0	0	0	0	0	8 0	0	8 Yes
			210								
Scott Dieckman	047	Unsecured Credit Card	46	46	0	0	0	0	0 0	0	0 46 Yes
			46								
Mark Smith	031	Quality Control	83	1	0	1	0	0	29 0	52	83 Yes
		Strategic Operations	17	0	0	0	1	0	0 0	16	
	034	Program Management	50	0	0	0	0	0	20 0	30	50 Yes
		Program Management CCAR	151	0	0	0	0	0	0 0	1	1 Yes
Troy Miller	046	Customer Service	191	0	46	6	42	4	93 0	0	
		Customer Service Operations OSP Vendor Management	4	0	0	0	0	0	4 0	0	
		CC Customer Service Support	260	0	40	0	54	38	128 0	0	
		CO Gustomer Gervice Gupport	458		-10	o _l	04	30	120		200 103
Brent Huisman	050	Asset Remarketing	58	0	0	0	0	1	6 2	49	
		CC Asset Remarketing Auctions	87 33	0	0	18	10	7	39 0	13 0	87 Yes 33 Yes
		CC Auctions	0	0	0	0	0	0	0 33	0	
	1	oo maalana	178	<u> </u>	<u> </u>				١		2 133
Deed Ordels	000	Consistent Consistent	2.5			0			641		C4)/
Brad Quick	038 038	Specialized Services Cease and Desist	61	0	0	0	0	0	61 0 0 0	0	
	035	Bankruptcy	107	0	1	21	0	0	85 0	0	
		CC Bankruptcy	7	0	0	0	0	0	7 0	0	
			175								
Wayne Nightengale	049	Late Stage	840	0	171	53	300	U	316	0	840 Yes
ayno migriterigale	043	Early Stage	86	0	7	0	25	0	54 0	0	
		CC Late Stage	181	0	31	0	83	0	67 0	0	
		CC Early Stage	182	0	83	0	67	0	32 0	0	182 Yes
		Collections Operations	1293	0	1	0	1	0	2 0	0	4 Yes
			1293								
Tony Kutiper	056	RL Orig Operations	2	1	0	0	0	0	1 0	0	2 Yes
		RL Sales	27	0	0	0	0	0	25 2	0	
	054	Funding Operations	57	2	0	0	0	52	0 0	3	
<u> </u>	 	Core Funding Core Call Center	57 54 22	24 10	1	0	11	0	0 0	0	54 Yes 22 Yes
	!	CarMax	14	14	0	0	0	0	0 0	0	
		Funding Direct	9	9	0	0	0	0	0 0	0	9 Yes
		Chrysler Subvention	0	0	0	0	0	0	0 0	0	0 Yes
		Fifth Third	0	0	0	0	0	0	0 0	0	0 Yes
		Funding Support	17 96	14	0	0	3	0	0 0	0	
		CC Funding CC Call Center	96	73	0	0	14	0	0 0	0	96 Yes 14 Yes
		NMAC	13	13	0	0	0	0	0 0	0	
-											

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 338 of 377 PageID 1163



Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 339 of 377 PageID 1164

From: Nicole Heinicke <nheinicke@santanderconsumerusa.com>

To: Kristen Lagunes klagunes@santanderconsumerusa.com, Whitney Andres

<wandres@santanderconsumerusa.com>, Jeanette Rodriguez

<JRODRIGUEZ@santanderconsumerusa.com>, Reena Mathew

<rmathew@santanderconsumerusa.com>, Sabrina Boyd

<SBOYD@santanderconsumerusa.com>, Melissa Lawson

<MLAWSON@santanderconsumerusa.com>, Andrew Scordo

<ascordo@santanderconsumerusa.com>

Cc: Angelina Hullum <AHULLUM@santanderconsumerusa.com>, Yessica Adriano

<YADRIANO@santanderconsumerusa.com>, Kayla Liggett

<a href="mailto:<a href="mailto:kliggett@santandercon

<selad@santanderconsumerusa.com>, Edward Fabritiis

<efabritiis@santanderconsumerusa.com>

Subject: Headcount

Date: Mon, 22 Feb 2016 17:07:12 +0000

Importance: Normal

Attachments: Headcount_by_Department.xlsm

Hello!

We have updated the Headcount report for this week. Please let me know if you have any questions. It can be found in the headcount folder on the G Drive. (G:\HR Site Folders\NRH\Headcount)

Thanks! Nicole

Nicole Heinicke

Santander Consumer USA Inc.

HR Generalist

PHONE 214.452.7016 MOBILE 214.212.8260

SVP/EVP	Cost Center	Departments	Headcount	Corporate
Mark Mooney	047	Reinstatements	45	0
		CC Reinstatements	13	0
		Recovery Operations	16	0
		Dealer Control	68	0
		Collateral Recovery	50	0
		CC Coll Recv	12	0
		Non Collateral Deficiency	14 54	0
		Vendor Oversight	6	0
	_	CC Vdr Oversight	278	0
	004	Is: 1 Al : 1 d		0
Dominique Doyenard	031	Dialer Administration	11	6
		Business Process Optimization	6	0
		Operational Analytics	12 29	0
			29	
Patrick Connor	031	Quality Assurance	52	0
		CC Dealer Advocacy and Maintenance	19	0
		Credit Bureau Advocacy	24	0
		Advocacy Analytics	1	0
		Customer Advocacy	21	0
	024	Legal & Regulatory Profes	18	0
		Legal & Regulatory Suppor	36	0
		Replevin	13	0
			184	
Graham Anderson	036	Titles	82	0
		CC Titles	18	0
		Insurance	49	0
		CC Insurance	19	0
		Account Services Unit ASU	43	0
		CC Account Services Unit	6	0
	050	Impounds	46	0
		CC Impounds	8	0
			271	
Scott Dieckman	047	Unsecured Credit Card	45	45
Cook Biochinan		Onesearea Great Gara	45	10
Mark Cmith	024	Quality Control	90	4
Mark Smith	031	Quality Control	82	1
		Strategic Operations	17	0
	0.04	IDrogram Managament		
	034	Program Management	51	
	034	Program Management Program Management CCAR	1	
	034	Program Management CCAR	151	
Tony Kutiper	034	Program Management CCAR Customer Service	1 151 182	0
Tony Kutiper		Program Management CCAR Customer Service Customer Service Operations	1 151 182 4	0 0
Tony Kutiper		Program Management CCAR Customer Service Customer Service Operations OSP Vendor Management	1 151 182 4 3	0 0 0
Tony Kutiper		Program Management CCAR Customer Service Customer Service Operations	1 151 182 4 3 262	0 0 0
Tony Kutiper		Program Management CCAR Customer Service Customer Service Operations OSP Vendor Management	1 151 182 4 3	0 0 0
Tony Kutiper Brent Huisman		Program Management CCAR Customer Service Customer Service Operations OSP Vendor Management	1 151 182 4 3 262	0 0 0 0 0

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 341 of 377 PageID 1166

		Auctions	33	0
		CC Auctions	0	0
		•	177	
		_		
Brad Quick	038	Specialized Services	61	0
	038	Cease and Desist	0	0
	035	Bankruptcy	107	0
		CC Bankruptcy	7	0
			175	
Marian Nicolate and In	0.40	li de Otario	005	0
Wayne Nightengale	049	Late Stage	835	0
		Early Stage	84	0
		CC Late Stage	183	0
		CC Early Stage	178	0
		Collections Operations	4	0
			1284	
Lana Johnson	056	RL Orig Operations	2	4
Lana Johnson	050	RL Sales	27	
	054	Funding Operations	60	0 2
	054	Core Funding	53	
		Core Call Center	22	24 10
		CarMax	14	14
		Funding Direct	9	9
		Chrysler Subvention	0	0
		Fifth Third	0	
			17	0
		Funding Support		14
		CC Funding CC Call Center	94	72
		NMAC	14 13	0
	048	Credit	91	13
	046	Credit Operations		0
	<u> </u>	Credit Operations	420	U
			420	
Jennifer Davis	040	Accounting	126	0
OCITITIO DAVIS	0+0	Accounting	126	U
			120	
Jim Brewster	045	IT Service Support	59	3
On Broweler	0.0	IT Call Center Office	20	0
		IT Client Services	14	0
	I		93	
Tobin Page	055	Profitability Analytics	5	0
<u> </u>	1	Data Reporting	19	0
		, ' '	24	

Total 3708

			Location	ı		
	Arapahoe II			North Richland Hills		Corporate THX
5	10	0	0	30	0	0
0	0	13	0	0	0	0
0	0	0	1	4	0	11 68
1	0	16	0	33	0	08
0	0	0	0	12	0	0
5	9	0	0	0	0	0
0	0	4	0	46	0	4
0	0	3	0	3	0	0
	0	-			0	
0	0	5	0	0	0	0
0	0	0 4	0	6	0 7	0
U	U	4	U	L	I	0
0	0	0	0	1	1	50
0	0	0	0	0	0	19
0	0	11	0	0	0	13
0	0	0	0	1	0	0
0	0	0	0	21	0	0
0	0	0	0	1	3	14
0	0	0	0	1	1	34
U	U	0	0	13	0	0
0	20	0	0	62	0	0
0	0	0	0	18	0	0
0	0	0	0	49	0	0
0	0	0	0	19	0	0
0	0	0	0	43	0	0
0	0	0	0	6	0	0
0	0	0	0	46 8	0	0
0	U	0	0	0	U	
0	0	0	0	0	0	0
0	1	0	0	29	0	51
0	0	1	0	0	0	16
0	0	0	0	20	0	31
0	0	0	0	0	0	1
48	0	41	0	93	0	0
0	0	0	0	33	0	1
0	0	0	0	1	2	0
39	0	53	42	128	0	0
0	0	0	1	6	3	49
0	18	10	5	38	0	14

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 343 of 377 PageID 1168

0	0	0	0	0	33	0
0	0	0	0	0	0	0
U	U	U	U	U	U	
0	0	0	0	61	0	0
	0					
0		0	0	0	0	0
1	21	0	0	85	0	0
0	0	0	0	7	0	0
172	54	297	0	312	0	0
6	0	24	0	54	0	0
31	0	84	0	68	0	0
				00		
81	0	65	0	32	0	0
1	0	1	0	1	0	1
			٥			
0	0	0	0	1	0	0
0		0	0	25	2	0
0	0	0	55	0	0	3
0	0	29	0	0	0	0
1	0	11	0	0	0	0
0	0	0	0	0	0	0
0	0	0	0	0	0	0
0	0	0	0	0	0	0
0	0	0		0	0	0
	U	U	0			
0	0	3	0	0	0	0
0	0	22	0	0	0	0
0	0	14	0	0	0	0
0	0	0	0	0	0	0
0	0	0	0	0	4	87
0	0	0	0	0	0	4
	-	-	-		-	
0	0	0		40		0.4
0	U	0	0	42	0	84
5	0	6	3	29	0	13
	0					
1		14	0	5	0	0
0	0	9	0	5	0	0
						□
0	0	0	0	0	0	E
0	0	0			0	5
0	0	1	0	11	2	5
	Gray Total	•			TUV Total	E92

Gray Total 0 THX Total 582

04-4-1	IN 1 - 4 - l-	. O - l- ::	ODEN	D	NA-1:	[\			A 1
<u>Subtotal</u>	<u>Match</u>	Sabrina	OPEN C12	Reena	Melissa	Whitney	Kristen	Jeanette	AJ
A F	Voc	94	612	647	107	694	414	28	530
	Yes				Combined	2426	İ		
	Yes				Combined	3126			
	Yes								
	Yes								
	Yes								
	Yes								
	Yes								
	Yes								
б	Yes								
11	Voc								
	Yes Yes								
12	Yes								
5 0	Yes								
	Yes								
	Yes								
	Yes								
	Yes								
	Yes								
	Yes								
	Yes								
13	165								
82	Yes								
	Yes								
	Yes								
	Yes								
	Yes								
	Yes								
	Yes								
	Yes								
Ū	100								
45	Yes								
82	Yes								
17	Yes								
51	Yes								
1	Yes								
	Yes								
	Yes								
	Yes								
262	Yes								
	Yes								
85	Yes								

- 33 Yes
- 0 Yes
- 61 Yes
- 0 Yes
- 107 Yes
 - 7 Yes
- 835 Yes
- 84 Yes
- 183 Yes
- 178 Yes
 - 4 Yes
 - 2 Yes
- 27 Yes
- 60 Yes
- 53 Yes
- 22 Yes
- 14 Yes 9 Yes
- 0 Yes
- 0 Yes
- 17 Yes
- 94 Yes
- 14 Yes
- 13 Yes
- 91 Yes
- 4 Yes
- 126 Yes
- 59 Yes
- 20 Yes
- 14 Yes
- 5 Yes
- 19 Yes

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 346 of 377 PageID 1171

From: Nicole Heinicke <nheinicke@santanderconsumerusa.com>

To: Kristen Lagunes <klagunes@santanderconsumerusa.com>, Whitney Andres

<wandres@santanderconsumerusa.com>, Jeanette Rodriguez

<JRODRIGUEZ@santanderconsumerusa.com>, Reena Mathew

<rmathew@santanderconsumerusa.com>, Sabrina Boyd

<SBOYD@santanderconsumerusa.com>, Melissa Lawson

<MLAWSON@santanderconsumerusa.com>, Andrew Scordo

<ascordo@santanderconsumerusa.com>

Cc: Angelina Hullum <AHULLUM@santanderconsumerusa.com>, Yessica Adriano

<YADRIANO@santanderconsumerusa.com>, Kayla Liggett

<a href="mailto:<a href="mailto:kliggett@santandercon

<selad@santanderconsumerusa.com>, Edward Fabritiis

<efabritiis@santanderconsumerusa.com>

Subject: Headcount March 2016

Date: Mon, 14 Mar 2016 16:34:06 +0000

Importance: Normal

Attachments: Headcount by Department.xlsm

Hello!

We have updated the Headcount report. Please let me know if you have any questions. It can be found in the headcount folder on the G Drive. (G:\HR Site Folders\NRH\Headcount)

Thanks! Nicole

Nicole Heinicke

Santander Consumer USA Inc. HR Generalist

PHONE 214.452.7016

MOBILE 214.212.8260

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 347 of 377 PageID 1172

SVP/EVP Cost Center Departments Headcount Mark Mooney Q47 Reinstatements 46	Maich Sabrina OPEN Reena Melissa Whithow Kristen Jeanette AJ
Mark Mooney 047 Reinstatements 46 0 5 11 0 0 30 0 0 CC Enienstatements 13 0	46 Yes 13 Yes 15 Yes 52 Yes 56 Yes 16 Yes 13 Yes 57 Yes 6 Yes 6 Yes 12 Yes 60 Yes 2 Yes 18 Yes 11 Yes 11 Yes 12 Yes 13 Yes 14 Yes 15 Yes 15 Yes 16 Yes 17 Yes 18 Yes
CC Reinstatements	13 Yes 15 Yes 15 Yes 52 Yes 55 Yes 16 Yes 13 Yes 57 Yes 6 Yes 11 Yes 6 Yes 12 Yes 60 Yes 3 Yes 12 Yes 60 Yes 13 Yes 14 Yes 15 Yes 18 Yes
Dealer Control 52	15 Yes 52 Yes 56 Yes 16 Yes 13 Yes 57 Yes 6 Yes 11 Yes 6 Yes 12 Yes 60 Yes 20 Yes 00 Yes 11 Yes 12 Yes 13 Yes 14 Yes 15 Yes 16 Yes 16 Yes 17 Yes 18 Yes
Dealer Control 52	56 Yes 16 Yes 13 Yes 57 Yes 6 Yes 11 Yes 6 Yes 12 Yes 60 Yes 20 Yes 3 Yes 0 Yes 1 Yes 18 Yes
CC Coll Recv	16 Yes 13 Yes 57 Yes 6 Yes 6 Yes 11 Yes 6 Yes 2 Yes 60 Yes 3 Yes 0 Yes 0 Yes 1 Yes 18 Yes 18 Yes 13 Yes 18 Yes
Non Collateral Deficiency	13 Yes 57 Yes 6 Yes 11 Yes 6 Yes 12 Yes 60 Yes 12 Yes 60 Yes 0 Yes 1 Yes 18 Yes 18 Yes 18 Yes 13 Yes 82 Yes 18 Yes 50 Yes 43 Yes 43 Yes
Vendor Oversight 57	57 Yes 6 Yes 11 Yes 6 Yes 12 Yes 60 Yes 12 Yes 60 Yes 0 Yes 1 Yes 1 Yes 18 Yes 13 Yes 13 Yes 13 Yes 14 Yes 15 Yes 16 Yes 17 Yes 18 Yes 18 Yes 18 Yes 18 Yes 18 Yes 18 Yes 18 Yes 18 Yes 18 Yes 18 Yes 18 Yes 18 Yes 18 Yes 18 Yes
Dominique Doyenard 031 Dialer Administration 11 5 0 0 5 0 1 0 0	6 Yes 11 Yes 6 Yes 12 Yes 60 Yes 3 Yes 0 Yes 1 Yes 1 Yes 18 Yes 13 Yes 82 Yes 18 Yes 50 Yes 43 Yes 43 Yes
Dominique Doyenard O31 Dialer Administration 11 5 0 0 5 0 1 0 0	6 Yes 12 Yes 60 Yes 3 Yes 0 Yes 1 Yes 14 Yes 18 Yes 18 Yes 18 Yes 18 Yes 18 Yes 18 Yes 18 Yes 19 Yes 10 Yes 11 Yes 11 Yes 11 Yes 11 Yes 12 Yes 13 Yes 14 Yes 15 Yes 16 Yes 17 Yes 18 Yes 18 Yes 18 Yes 18 Yes 18 Yes 18 Yes 18 Yes
Business Process Optimization 6 0 0 0 0 0 0 6 0 0	6 Yes 12 Yes 60 Yes 3 Yes 0 Yes 1 Yes 14 Yes 18 Yes 18 Yes 18 Yes 18 Yes 18 Yes 18 Yes 18 Yes 19 Yes 10 Yes 11 Yes 11 Yes 11 Yes 11 Yes 12 Yes 13 Yes 14 Yes 15 Yes 16 Yes 17 Yes 18 Yes 18 Yes 18 Yes 18 Yes 18 Yes 18 Yes 18 Yes
Business Process Optimization 6 0 0 0 0 0 0 6 0 0	6 Yes 12 Yes 60 Yes 3 Yes 0 Yes 1 Yes 14 Yes 18 Yes 18 Yes 18 Yes 18 Yes 18 Yes 18 Yes 18 Yes 19 Yes 10 Yes 11 Yes 11 Yes 11 Yes 11 Yes 12 Yes 13 Yes 14 Yes 15 Yes 16 Yes 17 Yes 18 Yes 18 Yes 18 Yes 18 Yes 18 Yes 18 Yes 18 Yes
Operational Analytics 12	12 Yes 60 Yes 3 Yes 0 Yes 0 Yes 1 Yes 18 Yes 18 Yes 13 Yes 82 Yes 18 Yes 50 Yes 18 Yes 43 Yes
Patrick Connor O31 Quality Assurance G0 O O O O O O O O O	3 Yes 0 Yes 0 Yes 1 Yes 18 Yes 18 Yes 18 Yes 13 Yes 82 Yes 18 Yes 50 Yes 18 Yes
CC Dealer Advocacy and Maintenance 3 0 0 0 0 0 0 0 0 0 3	3 Yes 0 Yes 0 Yes 1 Yes 18 Yes 18 Yes 18 Yes 13 Yes 82 Yes 18 Yes 50 Yes 18 Yes
CC Dealer Advocacy and Maintenance 3 0 0 0 0 0 0 0 0 0 3	3 Yes 0 Yes 0 Yes 1 Yes 18 Yes 18 Yes 18 Yes 13 Yes 82 Yes 18 Yes 50 Yes 18 Yes
Credit Bureau Advocacy	0 Yes 0 Yes 1 Yes 18 Yes 18 Yes 13 Yes 82 Yes 18 Yes 50 Yes 18 Yes 43 Yes
Customer Advocacy	1 Yes 18 Yes 18 Yes 18 Yes 13 Yes 82 Yes 18 Yes 50 Yes 18 Yes 43 Yes
1	18 Yes 18 Yes 13 Yes 82 Yes 18 Yes 50 Yes 18 Yes 43 Yes
Legal & Regulatory Suppor 18 0 0 0 0 0 1 1 16 Replevin 13 0 0 0 0 13 0 0 Titles 82 0 0 21 0 0 61 0 0 CC Titles 18 0 0 0 0 0 18 0 0	18 Yes 13 Yes 82 Yes 18 Yes 50 Yes 18 Yes 43 Yes
Replevin 13 0 0 0 0 13 0 0 0 0 0 0 0 0 0	13 Yes 82 Yes 18 Yes 50 Yes 18 Yes 43 Yes
113 Graham Anderson 036 Titles 82 0 0 21 0 0 61 0 0 0	82 Yes 18 Yes 50 Yes 18 Yes 43 Yes
CC Titles 18 0 0 0 0 0 18 0 0	18 Yes 50 Yes 18 Yes 43 Yes
CC Titles 18 0 0 0 0 0 18 0 0	18 Yes 50 Yes 18 Yes 43 Yes
	50 Yes 18 Yes 43 Yes
Insurance 50 0 0 0 0 0 50 0 0	18 Yes 43 Yes
Insurance 50 0 0 0 0 50 0 0 0	43 Yes
Account Services Unit ASU 43 0 0 0 0 0 43 0 0	
CC Account Services Unit 6 0 0 0 0 0 6 0 0	6 Yes
050 Impounds 43 0 0 0 0 0 0 43 0 0	43 Yes
CC Impounds 11 0 0 0 0 11 0 0	11 Yes
2/1	
Scott Dieckman 047 Unsecured Credit Card 38 38 0 0 0 0 0 0 0	38 Yes
38	
Mark Smith 031 Quality Control 67 1 0 1 0 29 0 36	67 Yes
Strategic Operations 2 0 0 0 1 0 0 1	2 Yes
034 Program Management 51 0 0 0 0 0 20 0 31	51 Yes
Program Management CCAR	1 Yes
	199 Yes
Customer Service Operations 5 0 0 0 0 1 3 0 1	5 Yes
OSP Vendor Management	4 Yes 277 Yes
CC Cusionier Service Support 277 0 444 3 31 33 229 0 0	211 165
Brent Huisman 050 Asset Remarketing 61 0 0 0 0 1 7 3 50	61 Yes
CC Asset Remarketing 87 0 0 18 10 6 38 0 15 Auctions 33 0 0 0 0 0 0 0 33 0	87 Yes
Auctions 33 0 0 0 0 0 0 33 0 CC Auctions 0 0 0 0 0 0 0 0 0 0	33 Yes 0 Yes
TECHNICIONS U U U U U U U U U U U U U U U U U U U	0 100
Brad Quick 038 Specialized Services 55 0 0 0 0 55 0 0 038 Cesses and Desist 0 <	55 Yes
	0 Yes 107 Yes
OSS Dankruptcy 107 0 1 21 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	7 Yes
169	
Wayne Nightengale 049 Late Stage 826 0 169 56 296 0 305 0 0	826 Yes
Wayne Nightengale 049 Late Stage 826 0 169 56 296 0 305 0 0 Early Stage 72 0 1 0 22 0 49 0 0	826 Yes 72 Yes
	182 Yes
CC Late Stage 182 0 32 0 81 0 69 0 0 CC Early Stage 189 0 84 0 68 0 37 0 0	189 Yes
Collections Operations 6 0 1 0 3 0 1 0 1	6 Yes
1275	
Lana Johnson 056 RL Orig Operations 2 1 0 0 0 1 1 0 0	2 Yes
RL Sales 27 0 0 0 0 0 25 2 0	27 Yes
054 Funding Operations 74 0 0 0 1 71 0 0 2	74 Yes
Core Funding 51 22 0 0 20 0 0 0 0	51 Yes
Core Call Center 21 10 1 0 10 0 0 0 0 0	21 Yes 14 Yes
CarMax 14 14 0 0 0 0 0 0 0 Funding Direct 9 9 0 0 0 0 0 0 0 0	9 Yes
Funding Direct 9 9 0 0 0 0 0 0 0 0	0 Yes
	0 Yes
Funding Support 17 14 0 0 3 0 0 0 0	17 Yes
CC Funding 89 68 0 0 21 0 0 0 0	89 Yes
CC Call Center 13 0 0 13 0 0 0 0 0 0 0 0 0	13 Yes
NMAC 13 13 0 0 0 0 0 0 0	13 Yes

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 348 of 377 PageID 1173

		- ···	00	0		۸۱			2	- 1	00
	048	Credit	92	U	0	0	0	U	0	4	88
		Credit Operations	3	0	0	0	0	0	0	0	3
			425								
ennifer Davis	040	Accounting	121	0	0	0	0	0	40	0	81
			121								
m Brewster	045	IT Service Support	59	3	5	0	6	3	29	0	13
		IT Call Center Office	20	0	1	0	14	0	5	0	0
		IT Client Services	14	0	0	0	9	0	5	0	0
		•	93					•			
obin Page	055	Profitability Analytics	7	0	0	0	0	0	0	0	7
		Data Reporting	20	0	0	0	1	0	12	2	5
		* * *	27	•					•		

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 349 of 377 PageID 1174

From: Nicole Heinicke <nheinicke@santanderconsumerusa.com>

To: Kristen Lagunes klagunes@santanderconsumerusa.com, Whitney Andres

<wandres@santanderconsumerusa.com>, Jeanette Rodriguez

<JRODRIGUEZ@santanderconsumerusa.com>, Reena Mathew

<rmathew@santanderconsumerusa.com>, Sabrina Boyd

<SBOYD@santanderconsumerusa.com>, Melissa Lawson

<MLAWSON@santanderconsumerusa.com>, Andrew Scordo

<ascordo@santanderconsumerusa.com>

Cc: Angelina Hullum <AHULLUM@santanderconsumerusa.com>, Yessica Adriano

<YADRIANO@santanderconsumerusa.com>, Kayla Liggett

<a href="mailto:kliggett@santanderconsumerusa.com>, Stephanie Elad

<selad@santanderconsumerusa.com>, Edward Fabritiis

<efabritiis@santanderconsumerusa.com>

Subject: Headcount

Date: Mon, 11 Apr 2016 13:43:25 +0000

Importance: Normal

Attachments: Headcount_by_ Department.xlsm

Hello!

We have updated the Headcount report. Please let me know if you have any questions. It can be found in the headcount folder on the G Drive. (G:\HR Site Folders\NRH\Headcount)

Thanks! Nicole

Nicole Heinicke

Santander Consumer USA Inc. HR Generalist

PHONE 214.452.7016

MOBILE 214.212.8260

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 350 of 377 PageID 1175

							Locat	on			Subtotal IMat-	Sabrina OPEN Pagna Molicea Military Vistan Isanett-
SVP/EVP	Cost Center	Departments	Headcount	Corporate Ara	apahoe I Arapah	ioe II Lewisv		North Richland Hills	Remote Office	Corporate THX	Subtotal Match	Sabrina OPEN Reena Melissa Whitney Kristen Jeanette AJ 93 605 643 180 671 334 28 530
Mark Mooney		Reinstatements	44	0	5	9	0	30	0		44 Yes	
		CC Reinstatements	13	0	0	0	13	0	0		13 Yes	Combined 3084
		Recovery Operations	17	0	0	0	0	4	0		17 Yes	
<u> </u>	+	Dealer Control Collateral Recovery	1 56	0	0	15	15	0 0	0		1 Yes 56 Yes	
		CC Coll Recv	29	0	0	13	0	16	0		29 Yes	
		Non Collateral Deficiency	12	0	0	12	0	0	0		12 Yes	
		Vendor Oversight	12 56	0	0	0	4	48	0	4	56 Yes	
		CC Vdr Oversight	6	0	0	0	3	3	0	0	6 Yes	
			234									
Dominique Doyenard	031	Dialer Administration	11	0	0	0	5	6	0	0	11 Yes	
		Business Process Optimization	6	0	0	0	0	1	0	5	6 Yes	
		Operational Analytics	13	0	0	0	1	1	6	5	13 Yes	
			30									
Patrick Conner	031	Quality Assurance	61	0	1	0	1	1 2	1	55	61 Yes	
		CC Dealer Advocacy and Maintenance	0	0	0	0	0	0	0	0	0 Yes	
		Credit Bureau Advocacy	0	0	0	0	0	0	0	0	0 Yes	
		Advocacy Analytics	0	0	0	0	0	0	0	0	0 Yes	
	004	Customer Advocacy	0	0	0	0	0	0 0	0	0 18	0 Yes	
	024	Legal & Regulatory Profes Legal & Regulatory Suppor	23 19	0	0	0	0	1	1	17	23 Yes 19 Yes	
		Replevin	13	0	0	0	0	13	0			
			116									
											_	
Graham Anderson	036	Titles	71	0	0	23	0	48	0		71 Yes	
-	+	CC Titles Insurance	31 48	0	0	0	0	31	0		31 Yes 48 Yes	
		CC Insurance	17	0	0	0	0	17	0		17 Yes	
		Account Services Unit ASU	40	0	0	0	0	40	0		40 Yes	
		CC Account Services Unit	10 44	0	0	0	0	10	0	0	10 Yes	
	050	Impounds	44	0	0	0	0	44	0		44 Yes	
		CC Impounds	10 271	0	0	0	0	10	0	0	10 Yes	
			2/1									
Scott Dieckman	047	Unsecured Credit Card	2	1	0	0	1	0	0	0	2 Yes	
			2									
Mark Smith	031	Quality Control	58	4	0	4	0	20	0	0.7	58 Yes	
Mark Smith	031	Strategic Operations	38	0	0	0	1	29	0		2 Yes	
	034	Program Management	52	0	0	0	0	20	0		52 Yes	
		Program Management CCAR	1	0	0	0	0	0	0	1	1 Yes	
			113									
Tanan Millan	0.40	0t	400	0	48	4	41 1	- 00	0	0	193 Yes	
Troy Miller	046	Customer Service Operations	193	0	48	0	0	1 88	0	0	6 Yes	
		OSP Vendor Management	3	0	ö	0	2	0 0	<u> </u>	Ö	3 Yes	
		CC Customer Service Support	266	0	39	3	52 5	120		0	266 Yes	
			468									
Brent Huisman	050	Asset Remarketing	64	0	٥١	٥	0	10	2	E1	64 Yes	
DIEIIL HUISIIIAII	030	CC Asset Remarketing	86	0	0	17	8	7 39	1	51 14		
		Auctions	86 32	Ö	0	0	0	0	32			
		CC Auctions	0	0	0	0	0	0	0	0	0 Yes	
			182									
Brad Quick	038	Specialized Services	56	0	0	0	0	56	0	0	56 Yes	
Drau Quick	038	Cease and Desist	0	0	0	0	0	0 0	0		0 Yes	
		Bankruptcy	108	0	1	25	0	82	0		108 Yes	
		CC Bankruptcy	7	0	0	0	0	7	0		7 Yes	
			171									
Wayne Nightengale	049	Late Stage	828	0	170	52	00	206	0	0	828 Yes	
vvayne migriterigate	049	Early Stage	88	0	0	0	37	1 50	0			
		CC Late Stage	177	0	31	0	81	65	0	0	177 Yes	
		CC Early Stage	179	0	55	0	64 2	36	0	0	179 Yes	
		Collections Operations	6	0	1	0	3	1	0	1	6 Yes	
			1278									
Lana Johnson	056	RL Orig Operations	2	1	0	0	0	1	0	0	2 Yes	
		RL Sales	27	0	0	0	0	25	2	0	27 Yes	
	054	Funding Operations	27 78	0	0	0	1 7	4 0	0		78 Yes	
		Core Funding	49	21	0	0	28	0	0		49 Yes	
	+	Core Call Center	21	9	1	0	11	0	0		21 Yes	
-	+	CarMax Funding Direct	12	12	0	0	0	0	0		12 Yes 9 Yes	
	+	Chrysler Subvention	0	0	0	0	0	0	0		0 Yes	
		Fifth Third	1 ŏ	ő	0	0	0	0	0		0 Yes	
		Funding Support	17	14	0	0	3	0	0	0	17 Yes	
		CC Funding	87	68	0	0	19	0	0	0	87 Yes	
		CC Call Center	13	0	01	01	131		0	0	13 Yes	
		NMAC	13	13		0	0		0			

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 351 of 377 PageID 1176

	048	Credit	91	0	0	0	0	0	0	4	87
		Credit Operations	3	0	0	0	0	0	0	0	3
	-	1 1	422		-						
ennifer Davis	040	Accounting	120	0	0	0	0	0	40	0	80
			120								
im Brewster	045	IT Service Support	63	3	5	0	6	4	32	0	13
		IT Call Center Office	21	0	2	0	14	0	4	0	1
		IT Client Services	14	0	0	0	8	0	6	0	0
			98								
obin Page	055	Profitability Analytics	7	0	0	0	0	0	0	0	7
		Data Reporting	21	0	0	0	1	0	12	2	6
			28				-		•		
					_	_					
		Total	3533		Gray	Total	0		Т	HX Total	449

Date	Sender First Name	Sender Last Name	Receiver	Points	Tags	Message	Visibility	Туре
8/28/2015	Kristen	Lagunes	Misty Donnell	150		Welcome to the team - you	public	award_points
9/9/2015	Nicole	Heinicke	Misty Donnell	50		You've been a great addition	public	award_points
9/14/2015	Angelina	Hullum	Misty Donnell	100	Excellence	Thank you for all your hard	public	award_points
						Thank you for assisting		
						me getting all my		
						reorganizations done; not		
						just helping but teaching		
						me how to do it and		
						keeping the parntership		
						open.		
11/4/2015	Kendra	Howard	Misty Donnell	10000		I appreciate all you do!	private	award_points

Date	Sender First Name	Sender Last Name	Receiver	Points	Tags	Message	Visibility	Туре
9/29/2015	Nicole	Prior	Susan Haynes	20	Service	Your constant follow up ar	public	award_points
10/12/2015	Ruth	Reagan	Susan Haynes	250		Happy Birthday!	public	award_points
10/13/2015	Stephanie	Bayley	Susan Haynes	5	Respect	Happy Belated Birthday! T	public	award_points
11/9/2015	Angelina	Hullum	Susan Haynes	200	Our People	Thank you for your assista	public	award_points
11/13/2015	Ruth	Reagan	Susan Haynes	200	Service	Thank you so much for helping us at Six Flags! From all of us on the Events Team!	public	award points
12/16/2015	Stephanie	Elad	Susan Haynes	1000		Thank you for the great pr	public	award_points
12/24/2015	Ken	Chung	Susan Haynes	1000	Service	Thank you for your guidan	public	award_points
12/28/2015	Kyshia	Gibbons	Susan Haynes	65	Excellence	Thank you for all your help	public	award_points
12/29/2015	Priyadarshini	Chitraputhran	Susan Haynes	10		Thank you for your guidan	public	award_points
12/30/2015	Krystal	Ricks	Susan Haynes	10	Our People	Thanks for all your support	public	award_points
3/4/2016	Talent	Engagement	Susan Haynes	10		Happy Employee Apprecia	t public	award_points
3/16/2016	Edward	Fabritiis	Susan Haynes	50	Service	Thank you for figuring out	public	award_points
4/22/2016	Talent	Engagement	Susan Haynes	1	Our People	Thanks for joining the YEI t	public	award_points

Date	Sender First Name	Sender Last Name	Receiver	Points	Tags	Message	Visibility	Туре
6/9/2015	Tobin	Page	Tina Mohan	100	Service	Thanks for all your help wi	public	award_points
6/9/2015	Premodh	Mohan	Tina Mohan	1	Our People	You are awesome, I adore	public	award_points
6/9/2015	Phuc	Lam	Tina Mohan	10)	Thanks for helping me with	private	award_points
6/10/2015	Susan	Odom	Tina Mohan	5	Excellence	Thanks for all your Help!!	public	award_points
6/10/2015	Sarah	Skinner	Tina Mohan	15	Performar	Thank you for your partner	public	award_points
6/11/2015	Nicole	Prior	Tina Mohan	15	Our People	Thanks for all you do for m	public	award_points
6/11/2015	Fatma	Rizvan	Tina Mohan	5	Respect	Thank you for being such a	public	award_points
6/11/2015	Yessica	Adriano	Tina Mohan	100	Our People	For doing such a great job	private	award_points
6/12/2015	Taniqua	Clay	Tina Mohan	5	Performar	Thank you for your partner	public	award_points
8/28/2015	Teara	Helsel	Tina Mohan	20	Excellence	Thanks for all the hard wo	public	award_points
11/13/2015	Stephanie	Elad	Tina Mohan	2000	Excellence	Tina - Thank you for your a	public	award_points
12/24/2015	Dana	Tucker	Tina Mohan	1000	Performar	Tina, Thank you for all you	public	award_points
12/29/2015	Vincent	Meglio	Tina Mohan	5000	Excellence	thanks for a great year and	private	award_points
1/4/2016	Christy	Miller	Tina Mohan	150	Service	Thank you all so much for	public	award_points
2/3/2016	Michelle	Latham	Tina Mohan	50	Respect	Thanks for your partnershi	public	award_points
2/18/2016	Katie	Strait	Tina Mohan	10	Excellence	Thank you for everything y	public	award_points
3/3/2016	Susan	Haynes	Tina Mohan	25	Our People	Thank you Tina for your he	public	award_points
3/4/2016	Talent	Engagement	Tina Mohan	10		Happy Employee Appreciat	public	award_points
6/9/2016	Tammie	Ross	Tina Mohan	100	Excellence	Thank you for all that you	public	award_points
6/17/2016	Christy	Miller	Tina Mohan	50	Service	Congrats on 3 years!!	public	award points

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 353 of 377 PageID 1178

6/10/2015	Susan	Odom	Jonathan Morse	5		Thanks for being "Payroll's	public	award_points
6/10/2015	Lisa	Fidler	Jonathan Morse	5	Performan	Thank you for all of your s	public	award_points
6/10/2015	Nicole	Prior	Jonathan Morse	15	Respect	Thanks for your ongoing su	public	award_points
6/10/2015	Premodh	Mohan	Jonathan Morse	2	Our People	For watching Mavs Game v	public	award_points
6/12/2015	Taniqua	Clay	Jonathan Morse	5	Our People	Thank you for your partner	public	award_points
9/1/2015	Angelina	Hullum	Jonathan Morse	5				high_five
9/1/2015	Stephanie	Elad	Jonathan Morse	2500	Service	Jonathan - Thank you for y	public	award_points
11/13/2015	Ruth	Reagan	Jonathan Morse	200	Service	Thank you so much for helping us at Six Flags! From all of us on the Events Team!	public	award_points
3/3/2016	Kristina	Carbonneau	Jonathan Morse	10	Our People	Thank you for all your help	public	award_points
3/4/2016	Talent	Engagement	Jonathan Morse	10		Happy Employee Appreciat	public	award_points
6/7/2016	Graham	Cameron	Jonathan Morse	100	Respect	Thanks to your support to	public	award_points
6/9/2016	Neeshta	Kewada	Jonathan Morse	10	Excellence	Thank you for all your hard	private	award_points
6/13/2016	Kristi	Cervantes	Jonathan Morse	5	Service	Thanks for all your help wi	public	award_points
6/15/2016	Stenhen	Shaffer	Jonathan Morse	500	Service	Jonathan, You have been invaluable in your assistance and help to me. I know it has been tough carrying a big load. I really appreciate it!	private	award points
	Jonathan	Rose	Jonathan Morse		Service	Happy Anniversary!!!!	public	award_points
7/1/2016		Fabritiis	Jonathan Morse		Service	Happy 3 years!	public	award points
,, 1, 2010	Luvuiu	TUDITUIS	301141111111111111111111111111111111111	3000	JCI VICE	riuppy o yeurs:	Public	a vv ai a_poii its

Date	Sender First Name	Sender Last Name	Receiver	Points	Tags	Message	Visibility	Туре
6/8/2015	Alicia	Feller	Hortensia Perez	100	Excellence	Thank you for all you do fo	public	award_points
6/9/2015	Susan	Odom	Hortensia Perez	5	Excellence	Ten Thank you for all your	public	award_points
6/11/2015	Fatma	Rizvan	Hortensia Perez	5	Performan	Thank you for always helpi	public	award_points
6/11/2015	Yessica	Adriano	Hortensia Perez	100	Service	Thanks for always staying of	private	award_points
6/12/2015	Dee	Walker	Hortensia Perez	25	Excellence	Everything you do!	public	award_points
6/12/2015	Taniqua	Clay	Hortensia Perez	5	Excellence	Thanks for being so aweso	public	award_points
6/12/2015	Corley	Cowan	Hortensia Perez	500	Our People	Add a message	private	award_points
7/22/2015	Yessica	Adriano	Hortensia Perez	229		Happy Bday !!!	private	award_points
8/28/2015	Kristen	Lagunes	Hortensia Perez	50		Thanks for the assistance a	public	award_points
11/5/2015	Reena	Mathew	Hortensia Perez	100	Performar	Reunitedit's been great	public	award_points
11/18/2015	Gabriela	Perez	Hortensia Perez	5	Respect	Great leadership!	public	award points

Date	Sender First Name	Sender Last Name	Receiver	Points	Tags	Message	Visibility	Туре
11/9/2015	Angelina	Hullum	Russell Tookes	200	Our People	Thank you for your assistar	public	award_points
11/12/2015	Susan	Haynes	Russell Tookes	50	Excellence	Thank you Russell for assis	public	award_points
11/12/2015	John	McAchran	Russell Tookes	25	Our People	Thank you for trying to ma	public	award_points
11/13/2015	Jade	Wiland	Russell Tookes	5				high_five
11/13/2015	Ruth	Reagan	Russell Tookes	200	Service	Thank you so much for helping us at Six Flags! From all of us on the Events Team!	public	award_points
1/5/2016	Sara	Lane	Russell Tookes	5	Excellence	Thanks for all you do to sup	public	award_points
1/19/2016	Nicole	Prior	Russell Tookes	10	Our People	Thank you for your continu	public	award_points
3/4/2016	Talent	Engagement	Russell Tookes	10		Happy Employee Appreciat	public	award_points





Human Resources | People Operations | Employee Relations | Adaptability

Keller, Texas, United States · Contact info

500+ connections



Harry Jones is a mutual connection









Exploring New Opportunities



Tarleton State University

About

SHRM-CP certified Human Resources professional with 14 years of experience including People Operations, Employee Relations, Compliance and Recruiting. I am enthusiastic about creating positive employee experiences, being a trusted teammate and optimizing HR processes while supporting organizational growth and development. I am currently in an operations generalist role where I work to continually optimize processes and resolve complex issues by leveragi ...see more



Top skills

Labor and Employment Law • Onboarding • Employee Relations • people operations • Collaborative Problem → Solving



Holly Hanes, SHRM-CP (She/Her)

Human Resources | People Operations | Employee Relations | Adaptability

532 followers



Comments

Images

Holly Hanes, SHRM-CP posted this • 1mo



I'm happy to share that I've completed my Bachelor of Business Administration - BBA at Tarleton State University!



7 comments

Holly Hanes, SHRM-CP posted this • 1mo



I'm very excited to share I have earned my Bachelors Degree!

After a very long journey of college that has included earning credits at 4 different institutions, spending a semester studying abroad in Italy, changing my major 3 times and two attempts at night classes,show more



42 comments

Show all posts →

Experience



SHRM-CP Certified | Human Resources | Employee Relations | Collaboration | Adaptability

Exploring New Opportunities

Sep 2022 - Present · 2 yrs 1 mo



People Operations Specialist

Cruise · Contract

Aug 2022 - Present · 2 yrs 2 mos

Remote

CRUISE, LLC, contract, Remote 8/2022 – curent

HR Operations Generalist ...

...see more

Onboarding, Global Human Resources Management and +13 skills

Senior Employee Relations Consultant

Full-time

Jul 2016 - Jan 2022 · 5 yrs 7 mos

Dallas, Texas

- Primary case manager handling all legal investigations and claims, becoming a trusted partner to inside and outside counsel as well liaising between all business lines.
- Developed in-depth knowledge of all systems to gather all pertinent information, providing critical data to drive positive outcomes for the company.
- Served as primary contact and project manager for i-Sight (internal case management system for claims and investigations) implementation and continued as administrator and SME for ongoing system improvement and assistance for entire Employee Relations department.
- Developed and improved the process for scanning and categorizing electronic personnel files. Supervised team of student workers responsible for accurately converting all paper files to electronic system.
- Employee Relations SME, providing guidance and direction to team and other lines of business.
- Communicated delicate information in a sensitive manner including executing the severance process from beginning to completion.
- Professional Certified Mentor (June 2021).
- ♥ Case Management, Employee Relations and +9 skills

Human Resources Compliance Analyst

Jun 2013 - Jul 2016 · 3 yrs 2 mos

- Managed all legal investigations and claims, partnering with inside and outside counsel as well liaising between all business lines.
- Collaborated with internal human resources (HR) groups to identify potential gaps and areas of opportunity in business processes, ensuring corrective steps were taken while mitigating risks.
- Ensured HR department operated in compliance with applicable laws and regulations as well as policies and procedures.
- Led compliance examinations independently of HR data, providing comprehensive compliance reporting.
- Maintained confidentiality with a high level of discretion and professionalism.
- ➡ Business Process Improvement, Subject Matter Experts and +8 skills

Talent Acquisition Specialist

Full-time

Sep 2011 - Jun 2013 · 1 yr 10 mos

- Managed the recruiting process for external candidates including exempt positions and high-volume nonexempt positions....
- ▼ Recruiting, Onboarding and +4 skills

Show all 4 experiences →

Don Uloth

From: Reena Mathew <rmathew@santanderconsumerusa.com>

Sent: Friday, April 8, 2016 11:03 AM

To: Yessica Adriano

Subject: Investigation Summary--Brittany Brodie

Hi Yessica,

Please see the summary below and notes attached for the Brittany Brodie investigation.

Date Complaint Received: 4/1/2016

Investigator: Reena Mathew, HR Business Partner; Witness: N/A **Complainant:** Brittany Brodie; Early Stage Account Manager

Accused: Emerial Woods; Latoria Chatman—Early Stage Account Managers

Witnesses: Karen Cantu/Bryson Gray—Early Stage Account Managers; Gerald Rahm—Early Stage Manager

Timeline of Investigation:

4/1/2016: AVP Jorge Munoz receives word from Manager Gerald Rahm that there was an incident during Gerald's jumpstart that morning; Jorge meets with HR Manager Yessica Adriano to discuss; Jorge and Yessica meet with Brittany to get her side of the story and associate is suspended until pending investigation is completed

4/1/2016: Reena Mathew meets with Emerial Woods/Karen Cantu to see what information they could provide regarding the incident

4/7/2016: Reena Mathew also meets with an additional witness, Bryson Gray, to see what information he could provide

Final Incident that led Complainant(s) to complain: On 4/1/2016, Brittany Brodie states she was in their team jumpstart **(Yessica, could you pls fill this part in?)**

Confirmed Accusations:

- Question regarding hygiene during jumpstart was made by Latoria
- High five was done between Emerial and Latoria
- Emerial did admit to allowing Latoria and vice versa to use her Workstation to clock herself in when she was running late; stated the last time it happened was a month ago
- Brittany did get assertive and stated 'We can take it outside and you can find out' towards Emerial
- Emerial didn't respond back to Latoria
- One witness stated that Emerial/Latoria were instigating with Brittany as they've had previous issues and that the hygiene comment was directed towards Brittany

Alleged and Unconfirmed Accusations:

- Hygiene and high five were directed towards Brittany
- Emerial and Latoria use each other's login information (username/password) to clock each other in and out of Kronos when they're running late
- Emerial stated Latoria bumped her when she and Latoria were coming back into the building (Latoria was the only witness)
- One witness states that he has heard Emerial talking on the phone with Latoria and stating 'hurry up, I think Jerry knows' regarding Emerial clocking Latoria in when Latoria hadn't arrived to work yet; said it's happened numerous times—even before the team moved to the other side of the building; Reena Mathew asked witness for specific dates so that the business can further look into but hasn't received anything as of yet.

App.391

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 358 of 377 PageID 1183

Recommendation: Based on confirmed accusations, I would recommend termination at this point in time for Brittany Brodie. We have a Manager and more than one witness say her behavior towards Emerial was aggressive and threatening. Although there seems to be some validity to Emerial/Latoria instigating, we are unable to prove it 100% because no one ever heard Brittany's name mentioned. Based on the Kronos findings, we can determine how to move forward with Emerial/Latoria, if there is in fact anything there.

Let me know if you need any additional information.

Thanks, Reena

Reena Mathew, PHR

Santander Consumer USA Inc. HR Business Partner

PHONE 214.292.2772

MOBILE 214.364.9136

FAX 214.630.0828

EMAIL rmathew@santanderconsumerusa.com

WEB www.santanderconsumerusa.com

BENEFITS HOTLINE 214.540.2010

Page 1 IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION REENA S. MATHEW, Plaintiff)) Civil Action No. 3:23-cv-01494-N) VS. SANTANDER CONSUMER USA INC., Defendant ORAL DEPOSITION OF YESSICA PEREZ, INDIVIDUALLY AND AS THE CORPORATE REPRESENTATIVE OF SANTANDER CONSUMER USA INC.

AUGUST 21, 2024
* * * * * * * * * * *

ORAL DEPOSITION OF YESSICA PEREZ, produced as a witness at the instance of the Plaintiff and duly sworn, was taken in the above-styled and numbered cause on August 21, 2024, from 9:38 a.m. to 3:41 p.m., before Christy Fagan, CSR, CRR, RMR, TMR, RPR in and for the State of Texas, reported by a Texas certified machine shorthand reporter at the offices of Hallett & Perrin, P.C., 1445 Ross Avenue, Suite 2400, Dallas, Texas, pursuant to the Federal Rules of Civil Procedure.

			\Box
		Page	2
1	APPEARANCES		
2	FOR THE PLAINTIFF:		
3	Mr. Donald E. Uloth		
	Donald E. Uloth, P.C.		
4	18208 Preston Road		
	Suite D-9 #261		
5	Dallas, Texas 75252		
	(214) 989-4396		
6	(866) 462-6179 Fax		
	don.uloth@uloth.pro		
7			
	FOR THE DEFENDANT:		
8			
	Mr. Monte Hurst		
9	Hallett & Perrin, P.C.		
	1445 Ross Avenue		
10	Suite 2400		
	Dallas, Texas 75202		
11	(214) 922-4111		
	(214) 922-4142 Fax		
12	monte.hurst@hallettperrin.com		
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 361 of 377 PageID 1186 Yessica Perez 8/21/2024

			Page 3
1		I N D E X	
2			PAGE
3	APPEA	RANCES	. 2
4	YESSI	CA PEREZ	
5	Exami	nation by Mr. Uloth	. 11
6	Signa	ture Page	.176
7	Court	Reporter's Certificate	.178
8		* * *	
9		EXHIBITS	
10	NO.	DESCRIPTION	PAGE
11	1	Plaintiff's Notice of Intent to Take the	5
		Oral Deposition of Santander Consumer USA	
12		Inc.	
13	2	email dated August 20, 2024	5
14	3	Santander Consumer USA Inc. Progressive	17
		Discipline Policy 2013 Bates stamped	
15		SC010464-470	
16	4	emails Bates stamped SC005910-13	45
17	5	emails Bates stamped SC009897-99	52
18	6	email Bates stamped SC001690	66
19	7	email Bates stamped SC001066	67
20	8	Reena Mathew PIP Bates stamped SC005409-12	83
21	9	2015 Mid-Year Review Bates stamped	90
		SC001484-95	
22			
	10	Final Report for HR - Reena Mathew Bates	93
23		stamped SC000021-30	
24	11	Reena Mathew PIP Bates stamped Mathew 049-55	99
25			

Case 3:23-cv-01494-N Document 36 Filed 09/20/24 Page 362 of 377 PageID 1187 Yessica Perez 8/21/2024

			Page 4
1		EXHIBITS (cont.)	
2	NO.	DESCRIPTION	PAGE
3	12	emails Bates stamped SC004058-60	100
4	13	90 Day Action Plan Bates stamped Mathew 047-48	116
5			
6	14	30 Day Review Bates stamped SC006924-32	122
	15	emails Bates stamped SC005740-41	127
7			
	16	March 23, 2016 Meeting Recap: Reena Mathew	134
8		(HRBP), Yessica Adriano (HRM), Stephanie Elad (HRD) Bates stamped SC002422-27	
9			
	17	Letter dated January 19, 2016, to Santander	165
10		Consumer USA from Spielberger Law Group	
		Bates stamped Mathew 081-83	
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			

```
Page 5
                       PROCEEDINGS
 1
                   (Exhibit Nos. 1 & 2 marked.)
 2
 3
                    THE REPORTER: Today is August 21, 2024.
 4
     The time is approximately 9:38 a.m. We are located in
 5
     Dallas, Texas.
                    This is the deposition of Yessica Perez,
 6
 7
     individually and as the corporate representative of
     Santander Consumer USA Inc. in the matter of Reena
 8
 9
     Mathew v. Santander Consumer USA Inc. and in the United
10
     States District Court for the Northern District of
     Texas, Dallas Division, Civil Action No.
11
     3:23-cv-01494-N.
12
13
                    My name is Christy Fagan, certified
14
     shorthand reporter, representing Legal Solutions Court
15
     Reporting.
                    Will all counsel please state their
16
17
     appearances and whom they represent and then I will
18
     swear in the witness.
19
                    MR. ULOTH: Donald Uloth for Reena S.
20
     Mathew, the plaintiff.
21
                    MR. HURST: Monte Hurst for Santander
22
     Consumer USA.
23
                          (Witness sworn.)
24
                    MR. ULOTH: Ms. Perez, bear with me for
25
     one moment.
```

Page 21 The one that was not completed by Ms. Angela 1 Q 2 Hullum until sometime in August; is that correct? I don't know the exact date of when it was 3 Α completed. I know that I reviewed the results with her 4 5 in September. If a Santander employee thought he or she was 6 7 being discriminated against, what was that employee 8 supposed to do? 9 Α They were supposed to take this to human 10 resources. 11 And, if that happened, what was human Q 12 resources supposed to do? 1.3 Α So human resources would receive the 14 grievance, the complaint. They would assign an investigator, and then at that point the investigator 15 16 would follow up with -- follow up and have interviews. 17 The practice is you start with the person 18 making the complaint. Then you interview the accused. 19 You interview any pertaining witnesses. The next step 20 is to collect all relevant documentation. It could be 21 emails, it could be reviews, all communication, all documentation related to that case. 22 23 At that time they decide if they need to 24 have follow-up interviews. If follow-up interviews are 25 required, then that is conducted. Then a time line is

Page 22 created. A recommendation for -- a recommendation and a 1 2 final summary. 3 Once that is done, then that is taken to the senior HR leader. So, for example, sir, if I 4 5 conduct an investigation as HR manager, I would go to my director. If my director did it, they would review that 6 7 with the vice president and so on. Upon reviewing the interview summaries 8 9 and recommendations, they discuss it and decide the best 10 course of action based on what they have. 11 Is it important to assign a neutral and Q 12 unbiased investigator? 13 Α Yes, sir. 14 Why is that important? Q 15 Α Because, as HR, we play a very important role in being objective. We need to uphold the standards of 16 17 being fair. 18 Did you do investigations during your time at Santander? 19 20 Α Yes, sir. 21 Did you ever disagree with the impressions or conclusions that a manager had about an employee's 22 23 performance? 24 Α Yes, sir. 25 Bad question, so I'm going to try this again.

(866) 830-1717

```
Page 178
                IN THE UNITED STATES DISTRICT COURT
 1
                FOR THE NORTHERN DISTRICT OF TEXAS
                          DALLAS DIVISION
 2
 3
     REENA S. MATHEW,
                                    )
          Plaintiff
                                        Civil Action No.
 4
                                         3:23-cv-01494-N
     VS.
 5
     SANTANDER CONSUMER USA INC.,
          Defendant
 6
 7
                      REPORTER'S CERTIFICATE
                        ORAL DEPOSITION OF
                    YESSICA PEREZ, INDIVIDUALLY
 8
                  AND AS CORPORATE REPRESENTATIVE
 9
                  OF SANTANDER CONSUMER USA INC.
                          AUGUST 21, 2024
10
11
          I, Christy Fagan, CSR, CRR, RMR, TMR, RPR,
12
     Certified Shorthand Reporter in and for the State of
13
     Texas, hereby certify to the following:
14
          That the witness, YESSICA PEREZ, was duly sworn and
15
     that the transcript of the deposition is a true record
16
     of the testimony given by the witness;
17
          I further certify that pursuant to FRCP Rule
     30(f)(1) that the signature of the deponent:
18
19
          X was requested by the deponent or a party
20
     before the completion of the deposition and is to be
21
     returned within 30 days from date of receipt of the
22
     transcript. If returned, the attached Changes and
23
     Signature Pages contain any changes and the reasons
24
     therefor:
25
               was not requested by the deponent or a party
```

```
Page 179
     before the completion of the deposition.
 1
          That pursuant to information given to the
 2
 3
     deposition officer at the time said testimony was taken,
     the following includes all parties of record and the
 4
 5
     amount of time used by each party at the time of the
 6
     deposition:
 7
     FOR THE PLAINTIFF:
8
               Mr. Donald E. Uloth (4 hours 16 minutes)
               Donald E. Uloth, P.C.
 9
               18208 Preston Road
               Suite D-9 #261
10
               Dallas, Texas 75252
               (214) 989-4396
11
               (866) 462-6179 Fax
               don.uloth@uloth.pro
12
     FOR THE DEFENDANT:
13
               Mr. Monte Hurst (0 hours 0 minutes)
14
               Hallett & Perrin, P.C.
               1445 Ross Avenue
               Suite 2400
15
               Dallas, Texas 75202
               (214) 922-4111
16
               (214) 922-4142 Fax
17
               monte.hurst@hallettperrin.com
18
          That $ is the deposition officer's charges
19
20
     to the Plaintiff for preparing the original deposition
21
     and any copies of exhibits.
          I further certify that I am neither counsel for,
22
23
     related to, nor employed by any of the parties in the
24
     action in which this proceeding was taken, and further
     that I am not financially or otherwise interested in the
25
```

	Page 180
1	outcome of this action.
2	Certified to by me on this 6th day of September,
3	2024.
4	
5	NOTC4
6	September 1997 Annual Control of the
7	aline Ann
8	Clusty Jasan
	Christy Fagan, CSR, CRR, RMR, TMR, RPR
9	Texas CSR 5459
	Expiration: 10/31/25
10	Legal Solutions Court Reporting
	Firm Registration No. 424
11	2626 Cole Avenue
	Suite 300
12	Dallas, Texas 75204
	(866) 830-1717
13	www.LegalSolutionsCourtReporting.com
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION					
REENA S. MATHEW,)				
Plaintiff,))				
VS.) Civil Action No.) 3:23-cv-01494-N				
SANTANDER CONSUMER USA, INC.,)))				
Defendant.))				

ORAL DEPOSITION OF SABRINA BOYD, produced as a witness at the instance of the Plaintiff, and duly sworn, was taken in the above-styled and numbered cause on the 29th of August, 2024, from 1:52 p.m. to 2:26 p.m., before Laurie Purdy, CSR, in and for the State of Texas, reported by machine shorthand, at the offices of Hallett & Perrin, PC, 1445 Ross Avenue, Suite 2400, in the City of Dallas, County of Dallas, State of Texas, pursuant to the Federal Rules of Civil Procedure, and the provisions stated on the record or attached hereto.

```
1
                      APPEARANCES
 2
    FOR THE PLAINTIFF:
         MR. DONALD E. ULOTH
         Law Office of Donald E. Uloth
 3
         18208 Preston Road, Suite D-9 \#261 Dallas, Texas 75252
 4
         T 214-989-4396
         don.uloth@uloth.pro
 5
 6
    FOR THE DEFENDANT:
 7
         MR. MONTE K. HURST
         Hallett & Perrin, PC
         1445 Ross Avenue, Suite 2400
 8
         Dallas, Texas 75202
         T 214-922-4111
 9
         monte.hurst@hallettperrin.com
10
11
12
13
14
15
16
17
18
19
20
21
22
23
2.4
25
```

1	INDEX
2	PAGE
3	Appearances
4	Scipulations 4
5	SABRINA BOYD
6	Examination by Mr. Uloth 4
7	Examination by Mr. Hurst 22
8	
9	Signature and Changes
10	
11	EXHIBITS
12	NO. DESCRIPTION PAGE
13	1 Litigation Hold Directive, 6
14	Bates SC010472 to SC010473
15	
16	
17	REPORTER'S NOTE Quotation marks are used for clarity and do not
18	necessarily reflect a direct quote.
19	
20	
21	
22	
23	
24	
25	

```
PROCEEDINGS
1
                   MR. ULOTH: Under the Federal Rules.
2
3
   No stipulations or agreements needed.
                        SABRINA BOYD,
4
   having been first duly sworn, testified as follows:
5
                         EXAMINATION
6
7
   BY MR. ULOTH:
              Hello, Ms. Boyd. I'm Don Uloth. Nice to
        0.
8
9
   meet you.
10
        Α.
             Nice to meet you.
        Q. I don't think this will be very long.
11
12
        Α.
              Okay.
              So it's my understanding you worked at
13
14
   Santander Consumer USA, Inc., at the same time as the
   plaintiff in this case, Reena Mathew, right?
15
16
        Α.
              Sure. Correct.
              And for today, you've been selected to talk
17
   about two topics that I wanted to ask the company
18
   about. Do you understand that?
19
20
        Α.
              I do.
              And one of the topics, defendant's efforts
2.1
   to preserve relevant evidence from January 29, 2016,
22
   to the present.
2.3
        Α.
24
              Okay.
25
              And have you studied up so that you're
        Q.
```

It's my understanding that it was. 1 Α. Where is that Outlook file today? 2 Ο. 3 Α. I don't know. It's my understanding that it was provided to -- there were some documents that 4 5 you guys requested, and those documentations was provided to you-all. 7 0. But you're not sure? Α. Correct. 8 In the 2015, 2016 time frame, how were 9 company policies kept in the usual course of 10 Santander's business? 11 We have a policy -- I guess we call it an 12 intranet where internal policies are kept. 13 14 Does Santander still have all of the 0. policies that were in effect back in 2015? 15 I don't know. 16 Α. Do you know why they would not? 17 Q. MR. HURST: Objection, form. 18 Α. I don't know. 19 20 0. (By Mr. Uloth) So it's possible that somebody could have deleted policies that were in 21 effect back in 2015, correct? 22 MR. HURST: Objection, form. 2.3 Α. I don't know. 24 25 (By Mr. Uloth) Are you familiar with what Q.

```
1
   the company called back in 2015 and 2016 disciplinary
   actions?
2.
3
         Α.
              I am.
              What did that term mean to you in that time
4
         Q.
   frame?
5
              Disciplinary action is a corrective action
6
7
   that's provided to an employee for doing something --
   for doing something incorrectly or something that
8
   they've been coached on previously. It's just
9
   basically corrective action to resolve whatever
10
   action they took that wasn't under company policy or
11
   procedure.
12
              When Santander did that and provided a
13
         Ο.
   disciplinary action to an employee, was there always
14
15
   a document created?
16
         Α.
              Yes.
                     Those disciplinary action documents,
17
              Okay.
         0.
   how were those kept in the usual course of
18
   Santander's business back in 2015?
19
20
         Α.
              They were scanned into Optica.
              Do you know if all of the DAs from 2015 are
2.1
         Ο.
   still preserved?
22
         Α.
              I don't know.
2.3
              Do you know if any of the DAs that Reena
24
         Q.
25
   Mathew worked on in 2015 have been preserved?
```

```
IN THE UNITED STATES DISTRICT COURT
1
              FOR THE NORTHERN DISTRICT OF TEXAS
                        DALLAS DIVISION
2.
3
   REENA S. MATHEW,
         Plaintiff,
4
5
   VS.
                                 Civil Action No.
                                 3:23-cv-01494-N
6
    SANTANDER CONSUMER USA,
7
    INC.,
         Defendant.
8
9
                   REPORTER'S CERTIFICATION
10
                      ORAL DEPOSITION OF
11
                          SABRINA BOYD
12
                       AUGUST 29, 2024
13
14
         I, Laurie Purdy, CSR, in and for the State of
15
16
   Texas, hereby certify to the following:
         That the witness, SABRINA BOYD, was duly sworn
17
   by the officer and that the transcript of the oral
18
   deposition is a true record of the testimony given by
19
   the witness;
20
         That the deposition transcript was submitted on
21
22
                   , 2024, to Monte K. Hurst, Attorney
   for the Witness, for the review and signature by the
2.3
2.4
   witness, to be returned to the reporter within 30
   days;
25
```

```
That the amount of time used by each party at
1
   the deposition is as follows:
2
              Mr. Uloth: 25 minutes
3
              Mr. Hurst: 2 minutes
4
         That pursuant to information given to the
5
   deposition officer at the time said testimony was
7
   taken, the following includes counsel for all parties
   of record:
8
9
   FOR THE PLAINTIFF:
        MR. DONALD E. ULOTH
10
         Law Office of Donald E. Uloth
11
         18208 Preston Road, Suite D-9 #261
         Dallas, Texas 75252
         T 214-989-4396
12
         don.uloth@uloth.pro
13
   FOR THE DEFENDANT:
14
        MR. MONTE K. HURST
        Hallett & Perrin, PC
15
         1445 Ross Avenue, Suite 2400
         Dallas, Texas 75202
16
         T 214-922-4111
17
        monte.hurst@hallettperrin.com
         That $ is the deposition officer's
18
   charges to the Plaintiff for preparing the original
19
   deposition transcript and any copies of exhibits;
20
         I further certify that I am neither counsel for,
21
22
   related to, nor employed by any of the parties or
2.3
   attorneys in the action in which proceeding was
   taken, and further that I am not financially or
2.4
   otherwise interested in the outcome of the action.
25
```

